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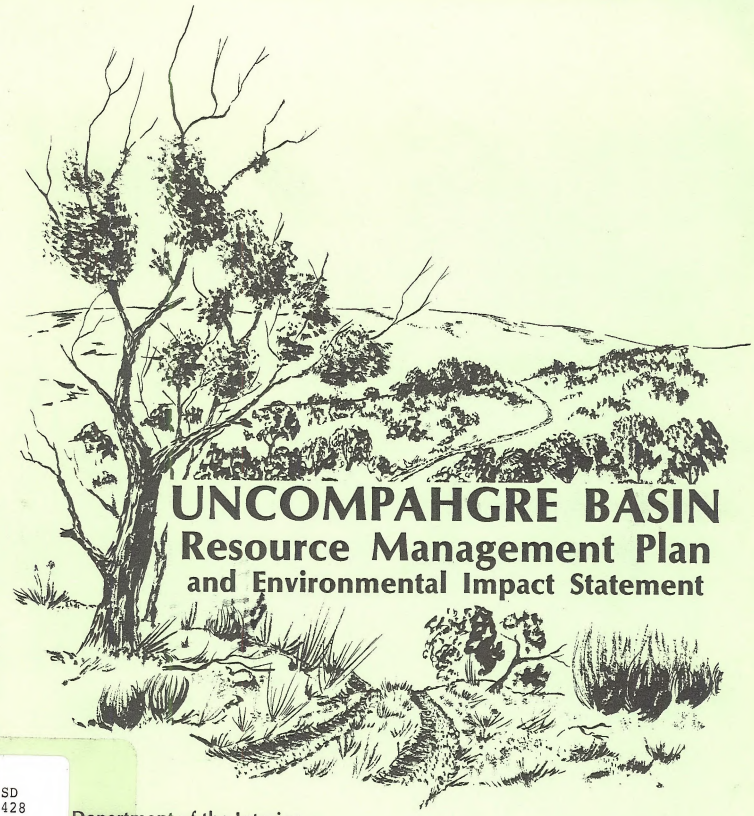

UNCOMPAHGRE BASIN
Resource Management Plan
and Environmental Impact Statement

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Department of the Interior
eau of Land Management
ntrose District, Colorado
ompahgre Basin Resource Area

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
MONTROSE DISTRICT OFFICE
2465 SOUTH TOWNSEND
MONTROSE, COLORADO 81401

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

Dear Reader:

Enclosed for your review is the Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Uncompahgre Basin Planning Area. The Proposed Resource Management Plan, hereinafter referred to as the Proposed Plan, is a refinement of the Preferred Alternative in the Draft Uncompahgre Basin RMP/EIS, with consideration given to public comment analysis, corrections, and rewording for clarification. The Proposed RMP and Final EIS is published in an abbreviated format and is designed to be used in conjunction with the Draft Uncompahgre Basin RMP/EIS which was released in June 1987.

The Proposed Plan is the Bureau of Land Management's proposed action. With the exception of the recommendations for the Camel Back, Adobe Badlands, and Gunnison Gorge Wilderness Study Areas, all parts of this Proposed Plan may be protested in accordance with the planning regulations, 43 CFR 1610.5-2. Protests shall be in writing and sent to the Director (760), Bureau of Land Management, Room 909, Premier Building, 1725 I Street, N.W., Washington, D.C. 20240, within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register. The protest shall include the following information:

The name, mailing address, telephone number, and interest of the person filing the protest.

A statement of the issue or issues being protested.

A statement of the part or parts of the plan being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the record.

A concise statement explaining why the proposed decision is believed to be wrong.

At the end of the 30-day protest period, and after the Governor's consistency review, the Proposed Plan, excluding any portions under protest, shall become final. Approval shall be withheld on any portion of the Proposed Plan under protest until final action has been completed on such protest. The Record of Decision and Final Resource Management Plan will then be published.

Sincerely,

Alan L. Kesterke

Alan L. Kesterke
District Manager

#18724863

ID: 88063983

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1988

UNCOMPAHGRE BASIN
PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT
SEPTEMBER 1988

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Prepared by:
United States Department of the Interior
Bureau of Land Management
Colorado State Office
Montrose District
Uncompahgre Basin Resource Area

Alan L. Kesterke
District Manager, Montrose

State Director, Colorado

UNCOMPAHGRE BASIN
PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT

Draft ( ) Final (X)

Lead Agency: The United States Department of the Interior, Bureau of Land Management

Type of Action: Administrative (X) Legislative ( )

This is the Proposed Resource Management Plan and Final Environmental Impact Statement for the Uncompahgre Basin Planning Area of the Uncompahgre Basin Resource Area.

This document responds to public comments on the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement. It corrects errors made in the Draft RMP/EIS and, based on public comments and internal BLM review, refines and modifies the Draft RMP/EIS Preferred Alternative. The modified Preferred Alternative is the Bureau of Land Management's Proposed Resource Management Plan.

This document incorporates by reference the Draft RMP/EIS which was released in June 1987; the Draft RMP/EIS must be used in conjunction with the Proposed RMP and Final EIS.

For further information on this Proposed Resource Management Plan and Final Environmental Impact Statement, contact Allan J. Belt, Area Manager, Bureau of Land Management, Uncompahgre Basin Resource Area, 2505 South Townsend Avenue, Montrose, Colorado 81401; telephone 303-249-7791 (commercial) or FTS 322-7300.

Protests to this Proposed Resource Management Plan must be received within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register.

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SUMMARY OF THE PROPOSED PLAN

This Proposed Resource Management Plan identifies the future management of the public lands in the Uncompahgre Basin planning area portion of the Uncompahgre Basin Resource Area in west-central Colorado. The Proposed Plan is a modified version of the Preferred Alternative presented in the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement (RMP/EIS), June 1987. A summary of the Proposed Plan by affected resource or resource use follows.

AIR QUALITY

Existing air quality would be maintained. All actions would comply with air quality standards and regulations.

COAL

Existing coal leases on 26,663 acres would be continued. Approximately 83,334 acres of federal coal estate in the Paonia/Somerset and Bookcliffs coal areas would be identified as acceptable for further coal leasing consideration. There are an additional 1,756 acres of federal coal reserves under private surface and within the Gunnison National Forest boundary. Approximately 920 acres would be acceptable for further coal leasing consideration with stipulations.

OIL, GAS, AND GEOTHERMAL RESOURCES

Leasing of federal oil, gas, and geothermal estate would be allowed on 484,349 acres with standard lease terms. There would be a yearlong no surface occupancy stipulation on 9,135 acres, and seasonal stipulations on 176,076 federal surface acres and on 16,136 acres of non-federal surface where the government holds the oil and gas mineral rights. Seasonal stipulations would also apply to seismic activities. The Gunnison Gorge WSA (21,038 acres) would be closed to leasing.

LOCATABLE MINERALS

Existing withdrawals currently close 59,250 acres to mineral entry and location under the mining laws. Under the proposed plan, it would be recommended that these withdrawals be retained on 9,440 acres, which includes the Needle Rock ONA/ACEC, and revoked on 49,890 acres. Revocation of the withdrawals would open 49,890 acres to mineral entry and location. The Gunnison Gorge WSA, the Escalante Canyon ACEC, and the Fairview RNA/ACEC (23,310 acres) would be closed to mineral entry and location. Mineral entry and location would be allowed on the remainder of the federal mineral estate (642,392 acres).

MINERAL MATERIALS

Disposal of mineral materials would be allowed on 444,532 acres of public land with federal mineral estate. Disposal of mineral materials would be subject to seasonal restrictions on 63,174 of these acres, and would require review by the agency holding the withdrawal on 9,360 acres. Disposal of mineral materials would not be permitted on 36,493 acres.

SOILS AND WATER RESOURCES

Water quality and erosion conditions would be inventoried and monitored. All actions under the proposed plan would comply with water quality standards and regulations. Approximately 26,547 acres, including the Elephant Skin Wash project, would be intensively managed to reduce salinity loads in the Colorado River. Projects and special protective measures would be developed. Projects designed to reduce runoff, erosion, and sediment on 47,260 acres could be developed if they would not conflict with big game and riparian habitat management, livestock grazing, and forest management.

RIPARIAN ZONES

Riparian zones on 6,320 acres would be improved through implementation of special protective and restorative measures. Riparian zones in the remainder of the planning area would be maintained in their present condition.

THREATENED AND ENDANGERED SPECIES

One ACEC, one RNA/ACEC, and one ONA/ACEC (a total of 9,055 acres) would be designated to protect threatened and endangered plants and unique plant associations, and to identify recreation hazards. Measures to protect threatened and endangered species would be required in plans for all surface-disturbing activities. Habitat suitable for bald eagles, peregrine falcons, and river otters would be maintained in the Gunnison Gorge area.

WILDLIFE HABITAT

Approximately 67,320 acres would be intensively managed as crucial deer and elk winter range. Big game forage allocations would be maintained at present levels. A total of 3,292 acres in the Storm King area would be

SUMMARY

intensively managed as elk calving habitat. Approximately 1,990 acres along the Gunnison River west of Delta would be intensively managed and improved for waterfowl habitat. Seventy (70) miles of streams would be intensively managed to restore and protect aquatic habitats. Habitat in the Gunnison Gorge and Camel Back areas would be managed for bighorn sheep; disturbances in these areas would be minimized.

LIVESTOCK GRAZING

Public lands would be managed as "I" category (336,562), "M" category (74,817 acres), and "C" category (39,033 acres) grazing allotments. Suitable unallotted lands on 26,873 acres would be considered for grazing use authorizations except on areas where wildlife has priority for forage. No livestock grazing would be allowed on 5,792 acres. Grazing use would be managed at present forage allocation levels. Land treatments and project developments would be restricted on 151,690 acres. Grazing use would be restricted (season of use, percent utilization) on 39,590 acres.

FORAGE ALLOCATION

Wildlife would have priority for allocation of future additional forage on 72,342 acres; livestock would have priority on 186,810 acres. Future additional forage on 193,612 acres would be divided evenly between wildlife and livestock. No additional forage would be allocated on the Adobe Badlands ONA/ACEC.

FORESTRY

Commercial forests on 3,127 acres (estimated allowable harvest of 160.5 MBF/year) and suitable woodlands on 24,255 acres (estimated allowable harvest of 1,213 cords/year) would be managed for sustained yield production. Seasonal restrictions would apply on 1,606 acres of commercial forest lands.

RECREATION

The outer portion of the Gunnison Gorge area (40,792 acres) would be managed for motorized and non-motorized recreation opportunities. Until a decision is made on wilderness designation, the Gunnison Gorge WSA would be managed for non-motorized recreation and whitewater boating opportunities. Boating use would be managed for six to ten group encounters per day, with commercial trips limited to one per day.

The Needle Rock area would be managed as an ONA/ACEC. The Escalante Canyon ACEC would be managed and developed for recreation use that would not conflict with threatened and endangered plants. The Adobe Badlands ONA/ACEC would be managed for its scenic qualities and for non-motorized recreation opportunities.

The lower Gunnison River, below the Escalante Bridge, would be managed for boating opportunities. River access would be developed and maps and information provided. A portion of the adobes north of Delta (8,942 acres) would be managed for ORV use. The remainder of the planning area would be managed for extensive recreation use.

OFF-ROAD VEHICLES

Approximately 224,276 acres would be managed as open to ORV use; 38,600 acres would be closed to ORV use. Vehicle use would be limited to designated roads and trails yearlong on 56,974 acres. There would be seasonal vehicle-use limitations on 163,227 acres.

CULTURAL RESOURCES

Cultural resources would be protected from surface-disturbing activities as required by law. A Class III inventory would be conducted on 5,848 acres west of Montrose and Olathe. Some identified high-value sites would be assigned a long-term protective classification.

VISUAL RESOURCES

Visual resources would be managed according to VRM guidelines, with 27,901 acres under VRM Class I; 27,384 acres under VRM Class II; 293,417 acres under VRM Class III; and 134,375 acres under VRM Class IV.

WILDERNESS

The Gunnison Gorge WSA (21,038 acres) would be recommended as preliminarily suitable for designation as wilderness. The Camel Back WSA and Adobe Badlands WSA (a total of 20,827 acres) would be recommended as non-suitable for designation as wilderness.

The Camel Back area would be closed to ORV use and managed with emphasis on riparian system, wildlife habitat, and livestock grazing management. The major portion of the Adobe Badlands area would be managed as an ONA/ACEC; the remainder of this area would be managed as wildlife habitat.

MAJOR UTILITIES

Public lands on 301,006 acres would be open to development of major utility facilities. A total of 82,038 acres would be closed to utility development. Special stipulations and conditions would restrict utility development on 100,033 acres.

LAND TENURE ADJUSTMENTS

One hundred forty-three (143) tracts of public land (totalling 11,026 acres) scattered throughout the planning area would be considered suitable for disposal. Non-federal lands would be considered for acquisition through exchange opportunities if such lands meet established criteria and enhance resource management within management units.

ACCESS

Public access would be acquired into 16 public land areas.

FIRE MANAGEMENT

Public lands totalling 110,252 acres would be managed for intensive fire suppression; 202,895 acres would be managed for conditional fire suppression. Prescribed fire would be permitted on 169,930 acres.

INTRODUCTION

This is the Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Uncompahgre Basin Planning Area. The RMP/EIS was prepared in accordance with planning regulations issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA). Included in this document are the public comments on the Draft Uncompahgre Basin RMP/EIS of June 1987 (Draft RMP/EIS), the Bureau of Land Management's (BLM's) responses to the public comments, the changes and corrections to the Draft Uncompahgre Basin RMP/EIS, and the Proposed Resource Management Plan.

The Proposed Resource Management Plan (Proposed Plan) identifies the future management of the public lands in the Uncompahgre Basin planning area portion of the Uncompahgre Basin Resource Area in west-central Colorado. The planning area encompasses a total of approximately 1.38 million acres in the BLM's Montrose District. The BLM has administrative responsibility for the public lands and resources on 483,077 surface acres and 755,923 acres of mineral estate within the planning area.

The Proposed Plan is very similar to the Preferred Alternative that was analyzed in the Draft RMP/EIS. In response to public comments and internal BLM review, several changes were made to the Preferred Alternative as it was developed into the final Proposed Plan. The major changes are as follows.

Oil, Gas, and Geothermal Resources. Leasing conditions for the Escalante Canyon ACEC and the Fairview RNA/ACEC were changed from standard lease terms to leasing with no surface occupancy. Leasing conditions for the Adobe Badlands ONA/ACEC were changed from standard lease terms with a seasonal restriction to leasing with no surface occupancy. The changes were based on public comments and managements' concern for protection of the resource values within the special management areas.

In this Proposed Plan, the scope of the oil and gas program has been expanded to include an analysis of split-estate management for oil and gas resources. Split-estate lands are those lands where the surface estate is owned by one entity and the mineral estate is owned by another. Throughout this document, split-estate will refer to non-federal surface with federal oil and gas resources. The decision to broaden the scope to include an analysis of split-estate lands was based on information resulting from the resolution of the BLM's authority in split-estate leasing precipitated by the resolution of protests on several recent BLM RMPs, including the Little Snake RMP.

The authority and legal responsibility of the BLM when issuing oil and gas leases on split-estate lands is covered under the following statutes:

Federal Land Policy and Management Act (FLPMA)
National Environmental Policy Act (NEPA)
National Historic Preservation Act (NHPA)
Endangered Species Act (ESA)

The BLM recognizes that it does not have the legal authority to regulate how a surface owner manages his or her property. However, the above statutes give the agency the statutory authority and responsibility to take reasonable measures to avoid or minimize environmental impacts that may result from federally-authorized mineral lease activities. This authority exists regardless of whether the surface is federally-owned or not.

Locatable Minerals. The Escalante Canyon ACEC and the Fairview RNA/ACEC, previously open to mineral entry and location, would be withdrawn from entry and location. These changes were based on public comments and managements' concern for protection of the resource values within the special management areas.

Mineral Materials. The Adobe Badlands ONA/ACEC, previously open for disposal of mineral materials with a seasonal (spring) restriction, would be closed to disposal of mineral materials. This change was based on the need to protect the values within the ONA/ACEC and also because mineral materials are readily available elsewhere in the planning area.

Riparian Areas. Under the Proposed Plan, livestock grazing use would not be permitted in riparian zones (within Management Unit 9) from March 1 through range readiness. The 35 percent utilization restriction would be used as general guidance for improvement, but could vary depending on the individual area. This change was based on the fact that differences in vegetative condition do exist between riparian areas. The 35 percent utilization limit would be implemented if necessary, but it was felt that substantial improvement could be achieved through implementation of other strategies, such as changes in the season of use.

Recreation. Under the Proposed Plan, the five-year period during which the BLM would manage use and activities in the Storm King Peak area to be compatible with potential ski area development would be eliminated. This change was based on the importance of the area's wildlife and timber values.

Off-Road Vehicles. Under the Proposed Plan, the 10,402 acres within the Camel Back WSA would be closed to ORV use. This change was based on the needs to prevent accidental destruction of threatened and endangered plants

as a result of ORV use, to protect visual qualities, and to reduce active erosion.

Special Management Areas. Approximately 6,783 acres within the Adobe Badlands WSA would be designated as the Adobe Badlands Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC). This change was based on the needs to protect the area's unique scenic qualities and its threatened and endangered plants, and to reduce active erosion.

Land Tenure Adjustments. Approximately 16,398 acres previously identified for consideration for disposal have been placed in the retention category. This change was based on public comments and managements' concern that certain tracts, especially larger blocks or tracts with public use values, be retained in public ownership.

REVIEW OF THE DRAFT RMP/EIS

AVAILABILITY AND REVIEW

The Draft Uncompahgre Basin RMP/EIS was filed with the Environmental Protection Agency (EPA) in July of 1987. A notice of availability and an announcement of the public hearings schedule was published in the *Federal Register*, August 7, 1987, page 29445. This same notice established a 90-day public comment period expiring on November 5, 1987.

News releases provided information on how to obtain copies of the Draft RMP/EIS and Draft Wilderness Technical Supplement (WTS), the locations at which the drafts could be reviewed, and the address for submission of written comments. Additional news releases announced the schedules for the formal public hearings which were held in Hotchkiss, Colorado, on September 22, 1987; in Lakewood, Colorado, on September 24, 1987; and in Montrose, Colorado, on September 29, 1987.

DISTRIBUTION OF THE DRAFT RMP/EIS

Approximately 800 copies of the Draft RMP/EIS and Draft WTS were distributed to federal, state, and local governments and agencies, Congressional and Legislative offices, private interest groups and organizations, academic and business institutions, and individuals. Distribution was by use of volume mailing and in response to individual requests for the documents. Copies of the documents were also available for public review and distribution in the BLM's Montrose District Office and Uncompahgre Basin Resource Area Office.

The cover letter in the Draft RMP/EIS solicited comments on both the Draft RMP/EIS and the Draft WTS from all recipients and reviewers.

The distribution list for the Draft RMP/EIS and Draft WTS included the following agencies and organizations in addition to approximately 500 individuals and businesses.

FEDERAL AGENCIES

Department of the Interior

Bureau of Land Management
- Headquarters Planning Office
- Colorado State Office
  - Canon City District Office
  - Craig District Office
  - Grand Junction District Office
  - Montrose District Office

Bureau of Mines
Bureau of Reclamation
Fish and Wildlife Service
National Park Service
- Black Canyon of the Gunnison National Monument
- Minerals, Water, and Air Quality Office

Department of Agriculture

Forest Service
- Supervisor's Office; Grand Mesa-Uncompahgre-Gunnison National Forest
  - Ouray Ranger District
  - Paonia Ranger District

Soil Conservation Service
- Delta Conservation District
- Shavano Conservation District

Department of Energy

Western Area Power Administration

Other Federal Agencies

Environmental Protection Agency
Federal Highway Administration
Advisory Council on Historic Preservation

COLORADO STATE AGENCIES

Department of Agriculture
Department of Natural Resources
- Division of Parks and Outdoor Recreation
- Division of Wildlife
- Colorado Natural Areas Program

Mined Land Reclamation Board
Natural Heritage Inventory
State Clearinghouse
State Historic Preservation Officer
District 10 Regional Planning Commission

COUNTY GOVERNMENTS AND AGENCIES

Delta County

Board of County Commissioners
Planning Commission
Planning Department

REVIEW OF THE DRAFT RMP/EIS

Montrose County

Board of County Commissioners
Planning Commission

Ouray County

Board of County Commissioners
Land Use Administrator

Gunnison County

Board of County Commissioners
Planning Commission

Mesa County

Board of County Commissioners
Policy and Research Office

MUNICIPAL GOVERNMENTS

City of Delta
City of Montrose
Town of Cedaredge
Town of Crawford
Town of Hotchkiss
Town of Olathe
Town of Orchard City
Town of Ouray
Town of Paonia
Town of Ridgway

CONGRESSIONAL AND LEGISLATIVE OFFICES

Distribution was made to the offices of Senator William L. Armstrong, Senator Timothy E. Wirth, and Congressman Ben Nighthorse Campbell, and to the offices of State Senators Robert DeNier and Robert Pastore, and State Representatives Ed Carpenter and Margaret Masson.

INTEREST GROUPS AND ORGANIZATIONS

American Wilderness Alliance
Audubon Society, Western Colorado Chapter
Chipeta Chapter, Colorado Archeology Society
Club 20
Colorado Historical Society
Colorado Mining Association
Colorado Mountain Club
Colorado Native Plant Society
Colorado Open Space Council
Colorado Trail Riders
Continental Divide Trail Society
Delta County Cattlemen's Association
Ducks Unlimited, Montrose Chapter
Grand Junction Geological Society
Gunnison County Stockgrowers' Association
Gunnison River Coalition
League of Women Voters
Minerals Exploration Coalition
Montrose County Chamber of Commerce
National Council of Public Land Users
National Wildlife Federation
Natural Resources Defense Council
The Nature Conservancy
North Fork Woolgrowers' Association
Ouray County Alliance
Ouray County Cattlemen's Association
Paonia Chamber of Commerce
Rocky Mountain Oil and Gas Association
Sierra Club, Rocky Mountain Chapter
Sierra Club, Uncompahgre Group
Society for Range Management
Southern Ute Tribe
Trout Unlimited, Montrose Chapter
Uncompahgre Valley Livestock Association
United Four Wheel Drive Association
Ute Mountain Tribe
Western Colorado Congress
Western Organization of Resource Councils
Western Slope Energy Research Center
Western Slope Woolgrowers' Association
Western Small Miners' Association
The Wilderness Society
Wildlife Management Institute
The Wildlife Society

PUBLIC COMMENTS

Fifty-one persons testified at the public hearings in Hotchkiss, Lakewood, and Montrose, Colorado. One hundred seventy-three (173) persons, groups, or agencies submitted written comments.

The transcripts of the public hearings and the written comments are reproduced in this document immediately following Table 2. Table 1 and Table 2 identify the commenters; the commenter number (first column of each table) appears in the upper right corner of the reproduced transcripts and written comments. The numbers in the third column of each table also appear in the margins of the reproduced transcripts and comment letters; they correspond to the BLM's responses to the questions and concerns that were brought forward in the testimony and in the written comments. The comment responses follow the transcripts and comment letters.

Table 1
PERSONS WHO TESTIFIED AT THE PUBLIC HEARINGS

COMMENTER NUMBER	COMMENTER	RESPONSE NUMBER
H-1	L.T. Mangum; City of Delta; Delta, Colorado	61
H-2	W.N. Brunner; Paonia, Colorado	1, 5, 6, 18, 48, 67, 68, 85, 127, 136
H-3	Mark Welsh; Hotchkiss, Colorado	13, 42
H-4	David Johnston; Paonia, Colorado	68, 136
H-5	John B. Benjamin; Hotchkiss, Colorado	12
H-6	Caleb Gates; Paonia, Colorado	68, 70, 136
H-7	Stephen F. Hinchman; Paonia, Colorado	7, 136, 137
H-8	Mark Paigen; Paonia, Colorado	12, 68, 69, 136
H-9	Gerrie Wolf; Cedaredge, Colorado	9, 66
H-10	Hank Hotze; Gunnison River Expeditions; Hotchkiss, Colorado	12, 68, 69, 136
H-11	Robin Nicholoff; Hotchkiss, Colorado	9, 13, 68, 69, 136
H-12	John Groome; Paonia, Colorado	68, 69, 136
H-13	Jerry Price; Whistling Acres Ranch; Paonia, Colorado	14
L-1	John Stansfield; Sierra Club, Pikes Peak Group; Monument, Colorado	68, 136
L-2	Carl Gerity; Quinn Coal Company; Golden, Colorado	34
L-3	Bill Foreman; Boulder, Colorado	28, 68, 136
L-4	Kirk Cunningham; Boulder, Colorado	28, 68, 136
L-5	Todd Robertson; Denver, Colorado	28, 68, 69, 136
L-6	Earl Jones; Boulder, Colorado	68, 136
L-7	Karin Molliver; Boulder, Colorado	28, 68, 136
L-8	Rocky Smith; Denver, Colorado	28, 68, 69, 136

Table 1 (continued)

COMMENTER NUMBER	COMMENTER	RESPONSE NUMBER
L-9	Allison Graves; CU Wilderness Study Group; Boulder, Colorado	28, 68, 69, 136
L-10	Steve Pettit; Boulder, Colorado	68, 136
L-11	Bruce Robson; Boulder, Colorado	28, 68, 69, 136
L-12	Roz McClellan; Boulder, Colorado	21, 68, 136
L-13	Norm Mullen; Boulder, Colorado	28, 68, 69, 136
L-14	Marty Walter; Boulder, Colorado	68, 69, 136
L-15	Eleanor Von Bargen; Colorado Native Plant Society; Denver, Colorado	68, 136
L-16	Scott Hatfield; Boulder, Colorado	68, 69, 136
L-17	Dave Allured; Boulder, Colorado	2, 28, 60, 68, 69, 136
L-18	Donald Thompson; Denver, Colorado	68, 69, 136
L-19	Polly Mills; Boulder, Colorado	68, 136
L-20	Jennie Spencer; CU Environmental Center; Boulder, Colorado	68, 136
L-21	Kirk Koepsel; Colorado Environmental Coalition; Denver, Colorado	19, 20, 22, 24, 28, 29, 31, 33, 42, 45, 46, 47, 63, 67, 68, 69, 72, 85, 94, 104, 119, 136
M-1	Kenneth Gray; Delta, Colorado	121
M-2	Melvin Thomas Gore; Delta, Colorado	65, 67
M-3	Jo Gore; Delta, Colorado	65, 105, 121
M-4	Mark Pearson; Sierra Club, Rocky Mountain Chapter; Grand Junction, Colorado	68, 69, 136
M-5	Les Hamilton; Uncompahgre Cattle Company; Delta, Colorado	121
M-6	John Musser; Delta, Colorado	121, 134
M-7	Walter Rule; Ouray, Colorado	68, 69, 136
M-8	Linda Delman; Montrose, Colorado	68, 69, 136
M-9	Bill Harris; Colorado Archeological Society, Chipeta Chapter; Montrose, Colorado	123, 124, 125

Table 1 (continued)

COMMENTER NUMBER	COMMENTER	RESPONSE NUMBER
M-10	Stuart Krebs; Montrose, Colorado	64, 68, 136
M-11	W.D. Wetlaufer; Montrose, Colorado	
M-12	John Baldus; Western Colorado Congress and Uncompahgre Valley Association; Montrose, Colorado	22, 28, 46, 69, 85, 107
M-13	Dave Seymour; Uncompahgre Livestock Association; Olathe, Colorado	67
M-14	Deborah Gore; Olathe, Colorado	121, 131
M-15	Richard Gore; Olathe, Colorado	111, 121, 131
M-16	Bill Hamilton; Cedaredge, Colorado	
M-17	Herschel "Bud" Burgess; Eckert, Colorado	

Table 2
PERSONS WHO SUBMITTED WRITTEN COMMENTS

COMMENT LETTER NUMBER	COMMENTER	RESPONSE NUMBER
1	Bureau of Reclamation; Upper Colorado Regional Office; Salt Lake City, Utah	49, 50, 71, 85, 87, 88, 89, 90, 91, 92, 93, 97, 128
2	U.S. Geological Survey; Assistant Director for Engineering Geology; Reston, Virginia	38, 39
3	Bureau of Mines; Intermountain Field Operations Center; Denver, Colorado	35, 71
4	National Park Service; Rocky Mountain Region; Denver, Colorado	16, 17, 68
5	U.S. Forest Service; Grand Mesa-Uncompahgre-Gunnison National Forests; Delta, Colorado	15, 108
6	U.S. Air Force; Regional Civil Engineer Central Region; Dallas, Texas	57
7	U.S. Fish and Wildlife Service; Fish and Wildlife Enhancement; Grand Junction, Colorado	11, 85, 99
8	Environmental Protection Agency; Region 8; Denver, Colorado	23, 24, 25, 27, 33, 44, 71, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 101, 102, 118
9	Colorado Department of Natural Resources; Office of the Executive Director; Denver, Colorado	7, 24, 27, 28, 36, 37, 38, 53, 67, 83, 85, 94, 100, 103, 104, 109, 119, 136
10	City of Delta; John R. Kappa, City Attorney; Montrose, Colorado	10, 54, 71
11	BLM Montrose District Advisory Council; Clay V. Bader, Chairman; Montrose, Colorado	3, 13, 30, 67, 68, 102, 136
12	BLM Montrose District Grazing Advisory Board; James Suckla, Chairman; Cortez, Colorado	121
13	Sierra Club Southwest Office; John Bradley; Boulder, Colorado	68, 136

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COMMENT LETTER NUMBER	COMMENTER	RESPONSE NUMBER
14	Colorado Mountain Club; Babs Schmerler; Montrose, Colorado	68, 69, 136
15	Colorado Archaeological Society, Chipeta Chapter; Bill Harris; Montrose, Colorado	123, 124, 125
16	Colorado Environmental Coalition; Kirk Koepsel; Denver, Colorado	22, 27, 28, 31, 32, 33, 42, 45, 46, 47, 63, 67, 68, 69, 85, 94, 104, 119, 136
17	Rocky Mountain Oil and Gas Association; Jess Cooper; Denver, Colorado	8
18	Minerals Exploration Coalition; John D. Wells; Lakewood, Colorado	43, 56
19	Audubon Society of Western Colorado; Richard Levad; Grand Junction, Colorado	4, 68, 130, 136, 137
20	Sierra Club, Rocky Mountain Chapter; Kirk Cunningham; Boulder, Colorado	40, 70
21	Delta County Livestock Association; John Botti; Crawford, Colorado	66, 68, 111, 131, 136
22	Sierra Club, Rocky Mountain Chapter; Mark Pearson; Grand Junction, Colorado	2, 41, 42, 51, 52, 60, 66, 68, 69, 71, 84, 85, 120, 131, 134, 136
23	Colorado Native Plant Society; Susan S. Martin; Fort Collins, Colorado	24, 27, 28, 67, 68, 100, 103, 116, 119, 135, 136
24	National Parks and Conservation Association; Terri Martin; Salt Lake City, Utah	47, 59, 63, 67, 68, 85, 101, 102, 136
25	Far Flung Adventures; Tracy Blashill; Ouray, Colorado	12, 68, 136
26	Richards and Richards; Shawn Mock; Nucla, Colorado	66, 68, 136
27	Richards and Richards; Shawn Mock; Nucla, Colorado	86
28	Campbell Cattle Company; David L. and Helen A. Campbell; Delta, Colorado	66, 68, 86, 136
29	Colorado Westmoreland, Inc.; Environmental Specialist; Paonia, Colorado	

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30	Musser Ranches; John A. Musser; Delta, Colorado	26, 67, 106, 113, 114, 121, 132, 133
31	Colorado Ute Electric Association, Inc.; Environmental Services; Montrose, Colorado	30, 58, 61, 71, 95, 112, 115
32	Chevron U.S.A., Inc.; Legislative and Regulatory Affairs; Denver, Colorado	8
33	Jerry D. Jacka; Phoenix, Arizona	
34	Kate Palmer; Boulder, Colorado	67, 70, 96
35	Dr. Frank Dennehy; Grand Junction, Colorado	68, 136
36	Chuck Shepard; Mancos, Colorado	68, 69, 136
37	Everett V. Carter; Cedaredge, Colorado	68, 69, 136
38	Jan Hose; Aspen, Colorado	68, 69, 136
39	Kurt Johnson; Boulder, Colorado	68, 136
40	Dick T. Brown and Victor H. Reed; Olathe, Colorado	85
41	Michele K. Whitaker; Wheatridge, Colorado	68, 69, 136
42	John Spezia; Steamboat Springs, Colorado	69
43	Nina Johnson; Boulder, Colorado	136
44	Paul E. and Virginia D. Lappala; Carbondale, Colorado	68, 69, 136
45	Greg McKennis; Glenwood Springs, Colorado	68, 69, 136
46	Claire C. Poole, Psy.D.; Denver, Colorado	62, 68, 69, 136
47	John Spezia; Steamboat Springs, Colorado	62, 68, 136
48	Charla Hathaway Palmer; Steamboat Springs, Colorado	68, 69, 136
49	Gordon Rodda; Knoxville, Tennessee	71, 136
50	Larry Abbott; Grand Junction, Colorado	6, 67
51	W. Rodney McKinnon; Montrose, Colorado	68, 136

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52	Tony Merten; Lakewood, Colorado	68, 69, 136
53	John Czarnecki; Lakewood, Colorado	68, 69, 136
54	Richard Kilbury; Albuquerque, New Mexico	68, 69, 136
55	William A. Coates; Cascade, Colorado	136
56	Jon Tourville; Colorado Springs, Colorado	68, 69, 136
57	Lorraine Lane; Denver, Colorado	69
58	Chris Seitz; Salina, Kansas	68, 69, 136
59	Dr. Thomas Scott; Fort Collins, Colorado	68, 136
60	Janna J. Harper; Black Hawk, Colorado	68, 69, 136
61	Marv and Judy Kieca; Castle Rock, Colorado	68, 136
62	Julie M. Emerson; Littleton, Colorado	69
63	Julie M. Emerson; Littleton, Colorado	68, 136
64	Dan Roberts; Grand Junction, Colorado	55, 67, 68, 69, 136
65	Chuck Worley; Cedaredge, Colorado	68, 136
66	William J. Tembrock et al.; Hotchkiss, Colorado	68, 69, 136
67	Eric D. and Ellen B. Braaten; Denver, Colorado	68, 69, 136
68	Harry Kuperberg; Boulder, Colorado	68, 69, 136
69	Roger Hedlund; Winter Park, Colorado	68, 136
70	Victoria and William Coe; Durango, Colorado	68, 136
71	Jon Sirkis; Boulder, Colorado	68, 69, 136
72	Mary Sealing; Fruita, Colorado	68, 136
73	Timothy J. Cunningham; Boulder, Colorado	62, 68, 69, 136
74	Mark Meeks; Denver, Colorado	68, 69, 136
75	Lorraine Lane; Denver, Colorado	68, 136

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76	Jane Schleimer; Boulder, Colorado	68, 69, 136
77	Harley Orahood; Grand Junction, Colorado	69, 136
78	Mrs. Robert Gray; Delta, Colorado	64
79	Jan and Luce Pipher; Maher, Colorado	86
80	Bruce Berger; Aspen, Colorado	68, 136
81	Mark N. Williams; Grand Junction, Colorado	68, 69, 136
82	Kenneth E. and Cheri W. Pettis; Olathe, Colorado	86
83	Kenneth E. and Cheri W. Pettis; Olathe, Colorado	68, 136
84	Richard and Gary Dickerson; Olathe, Colorado	86
85	Richard and Gary Dickerson; Olathe, Colorado	68, 136
86	Mr. and Mrs. William Byers et al.; Delta, Colorado	86
87	Mr. and Mrs. William Byers et al.; Delta, Colorado	66, 68, 136
88	Alford L. Gray and Patricia Harris; Olathe, Colorado	86
89	Alford L. Gray and Patricia Harris; Olathe, Colorado	66, 68, 136
90	W. Rodney McKinnon; Montrose, Colorado	
91	Mike Campbell; Oak Creek, Colorado	68, 69, 136
92	Edward G. Talbot; Arvada, Colorado	68, 136
93	Leonard L. and Helen M. Burch; Olathe, Colorado	86
94	Leonard L. and Helen M. Burch; Olathe, Colorado	68, 136
95	Andrew McConkey; Boulder, Colorado	68, 69, 136
96	George C. Calhoun; Delta, Colorado	68, 136

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97	Nic Korte; Grand Junction, Colorado	68, 69, 136
98	Jack R. Williams; Florissant, Colorado	68, 69, 136
99	John M. Kuzmiak; Pueblo, Colorado	68, 136
100	Al Hahn; Delta, Colorado	86
101	Al Hahn; Delta, Colorado	66, 68, 136
102	Diane Kelly; Evergreen, Colorado	68, 136
103	L. Yael Stein; Gunnison, Colorado	68, 136
104	Peter Schertz; Gardner, Colorado	68, 136
105	Mark W. Hamrick; Boulder, Colorado	68
106	Carl Will; Gardner, Colorado	68, 136
107	Suzanne Fairchild; Arvada, Colorado	68, 69, 136
108	Thomas Keyes; Denver, Colorado	68, 136
109	David Rubin; Lynnfield, Massachusetts	68, 136
110	Betty Nickerson Elwell; LaVeta, Colorado	68, 69, 136
111	Dale Hall and Rod Hall, Jr.; Olathe Colorado	86
112	M. Thomas Gore, D.V.M.; Delta, Colorado	65, 67, 136
113	Gerd Von Glinsk; Eldorado Springs, Colorado	68, 136
114	J. Zevalking; NO ADDRESS AVAILABLE	68, 136
115	Lynda Poff; Phillipsburg, New Jersey	68, 136
116	Marc Kriewaldt; Boulder, Colorado	68, 136
117	Jessica Wachtel; Boulder, Colorado	68, 136
118	David W. Ownby; Boulder, Colorado	68, 136
119	Penelope Crocker; Grand Junction, Colorado	68, 69, 136
120	Margot Smit; Denver, Colorado	68, 136
121	S.J. Clark; Niwot, Colorado	68, 136

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122	Scott Hatfield; Boulder, Colorado	68, 69, 136
123	Scott Robinson; Boulder, Colorado	68, 69, 136
124	Gary W. Cooper; Montrose, Colorado	86
125	Gary W. Cooper; Montrose, Colorado	66, 68, 136
126	Laurie Thayer; Boulder, Colorado	68, 136
127	Sarah Crum; Collbran, Colorado	68, 136
128	Dave Hamilton; LaVeta, Colorado	68, 69, 136
129	Henry G. Wright; Durango, Colorado	68, 129, 136
130	Eric Reische; Boulder, Colorado	68, 69, 136
131	Kerry Whitford; Boulder, Colorado	68, 136
132	Margaret Orjias; Olathe, Colorado	68, 136
133	Karla Tschoepe; Paonia, Colorado	68, 136
134	Karla Tschoepe; Paonia, Colorado	86
135	Eleanor Von Bargen; Denver, Colorado	67, 68, 85, 122, 136
136	Rodney Wilson; Cortez, Colorado	68, 69, 136
137	Patrick Muckleroy; Gunnison, Colorado	68, 136
138	Michael G. Figgs; Boulder, Colorado	136
139	Kale and Shirley Deutsch; Delta, Colorado	66, 68, 136
140	Kale and Shirley Deutsch; Delta, Colorado	86
141	Melvin K. Beach; Delta, Colorado	86
142	Melvin K. Beach; Delta, Colorado	66, 68, 136
143	Myles Standish et al.; Olathe, Colorado	66, 68, 136
144	Myles Standish et al.; Olathe, Colorado	86
145	Michael G. Goodman et al.; Olathe, Colorado	66, 68, 136
146	Michael G. Goodman et al.; Olathe, Colorado	86

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147	Bill Campbell; Delta, Colorado	64, 68, 136
148	Wanda and Larry Boyd; Delta, Colorado	86, 121, 136
149	Wanda and Larry Boyd; Delta, Colorado	68, 136
150	Lew and Margene Oswald; Broomfield, Colorado	66, 68, 136
151	Lew and Margene Oswald; Broomfield, Colorado	86
152	Harry B. Vaughan; Cedaredge, Colorado	9, 66, 68, 121, 136
153	Laura and Ray Wynfield; Lafayette, Colorado	68, 69, 136
154	Lorna F. Orth et al.; Olathe, Colorado	86
155	Lorna F. Orth et al.; Olathe, Colorado	68, 136
156	Jack Musser; Delta, Colorado	65, 98, 121, 133, 134
157	Bernice Musser; Delta, Colorado	
158	Lawrence A. Papp; Parker, Colorado	68, 69, 136
159	Applehanz Brothers et al.; Montrose, Colorado	86
160	Richard W. and Deborah R. Gore; Olathe, Colorado	68, 136
161	Richard W. and Deborah R. Gore; Olathe, Colorado	67, 69, 86, 98, 111, 117, 121
162	Lee and Helen Tunget; Olathe, Colorado	68, 136
163	Susan S. Martin, Ph.D.; Fort Collins, Colorado	27, 28, 67, 68, 103, 116, 119, 136
164	Josephine M. Gore; Delta, Colorado	111, 121, 136
165	Danni L. Langdon; Grand Junction, Colorado	67, 68, 69, 71, 126, 136
166	Susan Detweiler; Boulder, Colorado	68, 69, 136
167	Bella Conner; Grand Junction, Colorado	68, 69, 136
168	Carl E. Conner; Grand Junction, Colorado	68, 69, 71, 126, 136

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169	Myrna P. Steinkamp, Ph.D.; Fort Collins, Colorado	27, 67, 68, 100, 116, 119, 136
170	Bryan R. Jones; Boulder, Colorado	68, 136
171	Lewis McCool; Durango, Colorado	68, 136
172	Kathy Hands; Boulder, Colorado	67, 68, 69, 85, 110, 136
173	Anne Ellegood; Boulder, Colorado	68, 136

HEARING TRANSCRIPTS AND WRITTEN COMMENTS

All of the public testimony in the hearing transcripts and all of the written comments are reproduced in this section. The alphanumerics (H-1, L-1, M-1, etc.) and the numerals (1, 2, 3, etc.) appearing in the upper right corner of each page of the transcripts and written comments identify the commenter (see Table 1 and Table 2). Speakers at the public hearing in Hotchkiss are identified as "H" alphanumerics, with speakers at Lakewood being "L" and at Montrose being "M". These alphanumerics and numerals are also referenced in the comment response section.

The numbers in the margins of the reproduced transcripts and written comments are comment response numbers. The BLM's responses to concerns and questions are identified by these numbers. Many of the comment responses address common concerns and questions raised by several commenters. The comment responses are presented in the next section of this document.

H

PUBLIC HEARING TO RECEIVE INFORMATION AND COMMENTS ON THE ADEQUACY OF THE DRAFT UNCOMPAHGRE BASIN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, AND THE ACCOMPANYING WILDERNESS TECHNICAL SUPPLEMENT

HOTCHKISS MEMORIAL HALL

September 22, 1987

7:35 p.m.

JOHN SINGLAUB, PRESIDING OFFICER

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H-1

Thank you for your attention.

JOHN SINGLAUB: Thank you, Gene.

I'd like to apologize in advance for mispronouncing your names, I know I'll do that when I go through here. Please bear with me. Are there any elected representatives or officials of Federal, State or Local agencies who wish to testify at the hearing.

L. T. Mangum, City of Delta, would you like to speak, sir?

L. T. MANGUM: Yes.

JOHN SINGLAUB: If you could please step up to the podium, and state your name, address and who you represent, it would be helpful to us.

L. T. MANGUM: I'm L. T. Mangum, Mayor of the City of Delta.

61 As you refer to in your draft of June '87 of the Uncompahgre Basin and Wilderness Technical Supplement, the City of Delta does have some water rights in the Gunnison Gorge, and I would just like to say that we have been working with Congressman Ben Nighthorse Campbell's group to resolve some problems of our water rights in that canyon to try to make it into a national park instead of a national monument. This does not address what they plan to do with the City of Delta's water rights. And we haooen to know that they are valid water rights, and we don't think that

H-2

61 you can do some of these things that you are proposing to do here until you mitigate the question of what you propose to do with our water rights.

I believe you said that this wasn't a question and answer, just to take information. Well, that's the information I wanted to get to you.

JOHN SINGLAUB: Thank you, sir.

Any clarification needed?

We will proceed now to the list of speakers. W. N. Brunner.

W. N. BRUNNER: I'm Bill Brunner, I represent myself and also I'm a member of WSERC.

Generally this document is perhaps admirable in its intent, but falls short in substance. It offers practically zero data to back up substantive statements or conclusions. The economic impacts are glossed over to the point of practically being ignored. Recommendations are being made here to increase tremendously the impact of our public land with no discussion of values, and particularly no data presented to support BLM's position.

5 The discussions of resource locations is vague. Areas to be impacted by forest harvesting and mineral mining are not indicated individually on any of the maps in here, they are just referred to as so many acres impacted, and it's kind of left at that. I don't think that's

H-2

5 sufficient.

The maps in the back here that show what will happen to areas as far as off-road vehicle activity are concerned shows that an area is closed either seasonally, permanently or limited only to existing roads and trails. 6 I mean, that covers a broad scope and it should be broken down where it shows what areas are closed seasonally, what areas are limited to roads and trails, and what areas are closed permanently. They're vastly different categories, and they are all lumped together in one little map.

It presents very little data to base any conclusions as to impacts of implementing off-road vehicle use for most of the management area, which will happen under this plan.

It fails to identify on map or text the location of Storm King Ski area, it offers no data other than some little chart with some supposed numbers of skiers that will 1 ski there that increases from some million now to a few million more in a few years. There's no attribution made as to where this data came from, or any discussion of the area really beyond that.

It makes optimistic assumptions about allowable increases in grazing. It gives sketchy data on only a very 127 few grazing allotments specifically, and on the ones that are discussed in the plan here, it talks about how they are

in pretty bad shape, or under a lot of pressure from either livestock or wildlife. It yet goes on to come up with these 127 really optimistic ideas about how much grazing is going to increase over the district with very little real data on it. There's hardly any data in the whole thing. That's why I made comment that there's not enough in here for a person to look at it and really be able to make an informed decision.

And if you look at -- well, when the Forest Service puts out a document under the same mandate from Congress under the National Federal Land Management Policy Act, it's full of data. Some of it they make up, some of it's wrong, some of it's right, but they have data in there. And if you compare this plan to the GMUG Forest Plan, there's a vast difference. It's apparent to anybody who takes a half an hour to sit down and go through it, they will see a lot of difference. There's a lot of data developed by the Forest Service.

I've looked at the plans for the Grand Junction District and for the San Miguel San Juan District, and they have lots of data in there. They don't have as much as the Forest Service puts in, but they have a lot more than this document has.

And even with the amount of data that the Forest Service put out in the GMUG plan, that plan is under remand

right now because they didn't have enough data in there to support their management decisions. And it's a big waste of money for a Government agency to go through a process as costly and time consuming, and takes as much energy as from the people who put it together as this takes and let it fall into a situation where it's not going to satisfy hardly anybody because there isn't enough data in it to support what you're trying to do.

The plan describes the wilderness characteristic of three wilderness areas in the district, and then doesn't 68 recommend two of them for wilderness designation. And it 136 did not explain to my satisfaction why Canel Back and the Adobe Badlands are dropped from being proposed as a wilderness area without really saying why.

Something that I kind of wonder about is that there appears that there's going to be a lot more off-road recreational vehicle use here and there is really no discussion of why. And opening up to that, if there's a -- 67 it's planned to degrade the environment to where a lot of places, under the classification system, I think it goes under class three, and a definition of class three is where you look at that landscape, the things you notice is how it's torn up and, you know, why are you planning to change to landscape like that. What benefits are going to come to the people of this area, or the government, or whoever the

land is administered for by making those changes. It's not 67 spelled out. It's not said why you're doing that.

JOHN SINGLAUB: Could you wrap it up, Bill, your five minutes are up.

W. N. BRUNNER: I'll try.

A couple of things that I would recommend under land acquisition is that there currently is no public access for a take out point at the confluence of the Gunnison and the North Fork. When you come down the Gunnison River with any kind of flow at all you have to flow downstream to a point that you take out on private property. And I've been 48 threatened with loss of access to take out there, free access. I have to pay to take my boat out there. And the same thing down at Drysdale Flats, down by Austin. There's people that have been taking out in these places for a long time, and I wish the BLM would come up with some public access at that point.

And there is also a trail that comes down to within 20 feet of the Escalante Canyon Road out of the Dominguez Canyon wilderness area. That wilderness area is administered 18 by the Grand Junction District, but there's 20 feet of private land between the road and the wilderness area that's administered by this district. And because that 20 feet of land is privately owned, people cannot get to that trail. And I think that the BLM should make a sincere effort to

18 acquire an easement to get people into that trail, which is the only access to this end of that wilderness area.

And I'll have to say the rest in written comment.

JOHN SINGLAUB: Just for clarification. John Singlaub, BLM.

That's the McCarty trail?

W. N. BRUNNER: Which is probably -- there is criteria given for acquisition here in either a national historic or scenic trail, which is one of the things that classifies land or access available for acquisition by the BLM. It would also fit under two or three other classifications given in that area.

There is no criteria given for disposal of public 85 lands in this plan, either, though many are marked for disposal.

JOHN SINGLAUB: Can you clarify for the record what WSERC stands for?

W. N. BRUNNER: Western Slope Energy Resources Center.

JOHN SINGLAUB: Thank you.

Mark Walsh.

GENE VECCHIA: John, could I ask a question for clarification.

JOHN SINGLAUB: Sure.

GENE VECCHIA: Did I hear you say that under the

preferred alternative there was more, we're opening up more use to ORV use than is current, did you say that?

W. N. BRUNNER: I believe that's what's going to happen. It says here in the Chapter 3, preferred alternative, off-road vehicle use on public lands will be open to ORV use.

JOHN SINGLAUB: Go ahead.

MARK WELSH: My name is Mark Welsh, I live up on the Redlands outside of Hotchkiss.

I will try to just give a quick summary of my views of this document and not get into a page by page analysis.

Not too many years ago I remember reading the notice that came out from the Montrose Office of the BLM saying that they were going to do an RMP. It's a little peculiar that the first time we legally asked for one and legally challenged the BLM to have one that that was eleven years ago, but I understand how things take time. Unfortunately I think that that time has not been spent well when the BLM and when the team leader talked earlier about what this plan did and it's methodology. It certainly gave the impression that any conflicts between water and water right and coal mining were taken care of.

I've gone through this plan, I've read most of it and to me it was not evident that this has been done.

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But in general there are two problems with this plan, one has to do with its methodology. Is the plan, does the plan do what its supposed to do.

The second problem is how does it manage the resources. Now, you have got coal miners, you've got loggers, you've got hunters, you've got a wide variety of users and we all want ou use to be number one. But I think quite a while ago we realized there is a way to work out a concensus, there's a way to compromise and there's a way to fight for what you have. And unfortunately I see this document overemphasizing resource development, and I think that that would be to the detriment of Delta County and to the detriment to the industry that's here and the residents that are here, and particularly would affect the water users.

And I'd like to go to a couple of items in this document having to do with water. The mining of coal and locatable minerals could result in the permanent, irreversible loss of ground water through diversion and subsidence, page 4-63.

And over in the fourth chapter, fracturing and subsidence of rock strata from underground mining could decrease the quantity and quality of groundwater, loss of either surface or groundwater could impact adjudicated water rights and diminish local domestic and agricultural

water supplies.

Well, we live in a desert here, everybody knows that. But for some reason the decisions made say, just as one example, the goals in this document are out of line, I believe, as far as water users are concerned.

In the past there have been very good decisions made by the Bureau of Land Management, there was a concensus worked out with ditch people, the coal industry and the BLM and environmentalists in the past to try to resolve some of these issues. None of the past controversies involving development in this area are evident, either in the methodology in this document, or in the decisions. And I would strongly urge the BLM to take a cact, unlike the Forest Service and sit down with all of the users and try to not only improve their document, but to come up with management decisions that recognize the real resource conflicts and the competition that we all have on how do we want the public lands to take care of us. That has not been done in the past.

On the last two land use plans that have come out of this area have resulted in legal challenges, and I think by now the BLM should learn that there's a different way to do business, and by trying to save paper here, by leaving out information, detracts from the purpose of the document. I can't tell how I'm going to be effected. My neighbors

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can't tell how they are going to be affected, and the manager in the BLM can't get very good guidance here, or determine what the impacts of his choice between the alternatives.

My last comment goes to looking at the different alternatives that are here, and we could all get cross eyed looking at the small print. But there are a number of different alternatives.

The preferred alternative; the conservation alternative, which means hardly do anything; the production alternative, which means let's do the most; versus what we are doing right now. So we have got four alternatives.

42

Under just one resource, which is coal, they are almost all the same. They are off by a couple of acres. And you can go through this and see that there really isn't that much choice.

So, again, I don't want to go into any more detail on the documents, but I would strongly encourage the BLM to set up a non-adversarial process with all of the public land users to try to come up with a better plan for our valley.

JOHN SINGLAUB: Thank you, Mark.

David Johnston.

DAVID JOHNSTON: I'm David Johnston from Paonia, I'm speaking for myself.

I want to talk mainly about wilderness. First I wanted to congratulate the BLM on their recommendation on the Gunnison Gorge as a wilderness area. I've been through it and I think everybody, or almost everybody in the county thinks that it's a great place and should be a wilderness area. We also think that it should be a wild and scenic river, I know the BLM has recommended that and can't get it through Congress. I think that's well and that should be encouraged and the BLM should be applauded for making that recommendation. I think it's a very worthwhile place to be wilderness.

As to the Camel Back, I haven't been in that area, but I've talked to people who have been there and I've read some of the documents on it. It seems there's very little conflict with any uses of the area, and I would like to see the Camel Back also designated as wilderness.

I have been through the Adobe Badlands, and I think it's a big mistake not to designate that area as wilderness.

I'd like to read a quote kind of buried in your document, but with this recognition I don't see how it cannot be labeled recommended as wilderness.

On page 3-11 it states "Geologically, the Adobe Badlands WSA is highly varied and diversified. The majority of the WSA consists of Badland-type formations, or "adobe" hills, where coloration changes abruptly with shifts in

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68

lighting. The upper portion of the Adobe Badlands is rolling, rugged, pinyon-juniper foothills cut by numerous, small drainages. Human imprints are minor."

Skipping down a little bit. "The Adobe Badlands WSA provides many opportunities for solitude. The maze-like Badlands and upper pinyon-juniper vegetation effectively screen visitors and foster a feeling of intimacy. The sloping topography affords sweeping views of the lower Badlands as well as Grand Mesa, the Uncompahgre Plateau, and the San Juan Mountains which stimulate feelings of solitude and remoteness."

"The topography of the Adobe Badlands offers outstanding opportunities for primitive and unconfined recreation. The upper woodland areas provide excellent hunting. The WSA affords yearlong opportunities for hiking, horseback riding, photography, and sightseeing."

I might also add it has interesting names, it's kind of like a neurotic trip through hell. You start off right below Hell's Hole and go right down between Devil's Thumb and Susie's Tit. And it's a real interesting place, you get out in the middle of it and you're just miles away from everywhere.

Modern language has two meanings for bad; one is bad is not good, and the other is bad that it's real good. And I think this place is bad, and I think it should be

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designated wilderness. Thanks.

JOHN SINGLAUB: Thank you.

John B. Benjamin.

JOHN B. BENJAMIN: Good evening, I'm John Benjamin from up on Redlands Mesa, 1591 2900 Road, it used to be Route 2. That's the kind of way things change, I think.

But I'm talking today as an individual, as a fisherman, boatman, small farmer, real estate tycoon, conservationist and taxpayer.

So my first question as a taxpayer is how many people here tonight are getting paid to be here by us taxpayers? You guys don't get paid to come, that's great. That's interesting. I know the Commissioners don't get paid. I know I don't get paid, that's one of the problems I have with being here, I don't get paid. Although my boss did give me a $5 a day raise here, he's Hank Hotze, over there, I run boats for him periodically, so I'm going to pretty much keep my -- he's not saying me to be here tonight, but he might buy me a beer later on. But I'm going to keep my comments pretty much to the river and gorge.

Once again I concur with David over there, that you should be recommended, you would have been lynched if you hadn't, but you should be recommended, or commended, for making the gorge a wilderness, or suggesting that the gorge become a wilderness area.

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As a conservationist I also think that the conservation alternative there should be followed, that's my preference.

I think all three WSA's are unique and valid merit and only represent, what, less than ten percent of your total plan mass here that you have taken charge of.

So I like them all, but I like the gorge the best, and I like the gorge the best because I have been down there for the last six years running that thing for Hank and know it well. I probably know it better than most people in the room, except for Hank.

I want to make a few recommendations about specific management down there. I know that the BLM, and one of the only problems I have with the BLM taking it over as a wilderness area and the BLM managing it as a wilderness area is the BLM is notoriously short of funds for management. And I know this summer, for instance, they only had one person down there pretty much full-time, well, not even full-time. It's been tough to keep track of what's going on down there. The resauce has been really trashed out. Anyone who has been down there lately, and Mark knows, and, of course, Caleb, it's really trashed out.

I think rather than to have voluntary regulations in effect down there as far as low impact camping go, they cannot be voluntary, but they must be mandatory. And what

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they must be, they must be no wood burning, they must be fire pan used. They must use portable stoves, you know, you can't --

Portapotties are a must, ladies and gentlemen, in this modern day and age in the river. It's such a frigile environment down there. You've got to pack everything out that you pack in, including your own trash and human waste. 12

I would also recommend, and I might have some frowns from certain sectors in the room on this one, but both the trail to Chuckar and Duncan should probably be -- the trail heads should be moved back further from the rim and that would weed out a few people that are abusing the area around there, and hopefully keep the wilderness values intact that are now being trashed out.

That's about it, thank you.

JOHN SINGLAUB: Thank you, John.

Caleb Gates.

JON SERING: Jon Sering again, if I would ask a clarifying question. 68 136

JOHN B. BENJAMIN: Yes.

JON SERING: You said that Chuckar and Duncan should be moved back further from the rim, do you mean --

JOHN B. BENJAMIN: The vehicle access.

JON SERING: Further from the, move the trail head back so it's further from the river?

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JOHN B. BENJAMIN: Yes. So it gives you that much more of a buffer area and keeps vehicles from approaching as close as they can now.

JON SERING: Okay. I just want to clarify, meaning the trail -- you're just making the trail further from the river, not from the rim? Closer to the rim rather than further?

JOHN B. BENJAMIN: I would like to make it so it's a longer hike in.

JON SERING: Okay. Thank you.

JOHN SINGLAUB: Caleb Gates.

CALEB GATES: I'm Caleb Gates, I'm representing myself and river runners. I raft for Gunnison River Expeditions and I live in Paonia.

Some of my concerns -- first of all, I'm glad that the Gunnison Gorge is recommended for wilderness, but I think with the huge acreage that is also upper management plan, that the Camel Back and Adobe Badlands areas should be recommended.

The Camel Back offers a full opportunity for solitude, and the Adobe Badlands which are, as I read, highly erodible and not really suitable for grazing, would probably be best as a wilderness area. They are not off-road vehicle or grazing areas.

70 And then I got some concerns on just some of the

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perspective used in putting or organizating data. I kind of think that less grazing you're going to have less erosion, less salinity, and you're going to have to do less corrective measures.

Throughout the book you're talking about corrective measures in channels, meaning river channels, to correct salinity problems. I think if you have smart land 70 use and prevent these things from happening that you are not going to have to spend ten times the amount of money to correct them. And I don't think I see enough of that in the book.

Such as off-road vehicle use in the Peach Valley, that has some of the highest total dissolved salt concentrate, and that off-road vehicle use seems pretty high as that is planned. And I think that that should be less than those highly sensitive areas.

And then, lastly, I would like to see legislation enacted sometime and somewhere where the BLM can have enforcement to write citations and help keep the Gunnison Gorge recreation area clean and to force private river-runners to have -- to act as commercial ones and carry out their garbage.

Thank you.

JOHN SINGLAUB: Thank you.

Stephen F. Hinchman. If you can spell your last

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name, it's kind of blurred here on our sheet.

STEPHEN F. HINCHMAN: H-i-n-c-h-m-a-n.

JOHN SINGLAUB: Thank you.

STEPHEN F. HINCHMAN: My name is Stephen Hinchman, and I live in Paonia, I have been here about a year now in the valley, my work brought me here, but if it didn't, I would visit it anyway. Not to visit the communities of Delta or Montrose, but to come to the many wild areas that we have in our counties here.

I'm going to speak about the Camel Back wilderness area. You sent your experts in the past couple of years to evaluate the area's suitability for wilderness desinnation.

Well, the comments in your little book here, they found the Camel Back to fit the criteria for wilderness, however, the recommendation is non-suitable.

So I packed up the EIS and the RMP and went out there myself and spent two days and nights in the Camel Back to do my own study. I found the Camel Back to be more than suitable, I found it delightful.

I hope the pictures that I took, which are up on the wall back there, can make it a real place for some of the people that didn't get to go out there.

The canyon is not the kind of place that you escape from go get away from it all when you go to the wilderness, it's more like the feeling of you're going to

get to it all. And the Camel Back is such a place.

I spent two nights up on the wind-whipped mesa tops, with starry nights, hard rocky bed and spectacular dawns.

The days were spent well, one meandering across Winter Mesa with its hot, parched grasses looking over-grazed to me and fatigued by invading sage. Lots of lonely pinyon trees, and I took some siestas in the cool draws. Heard a hawk, but it wouldn't come close enough to identify. It's choppy, but it's flat country in the Uncompahgre Plateau, even though you're up there. I enjoyed it a lot and I had a lot of ample opportunity for solitude, I could tell I was alone.

The next day was similar and quiet. From the canyon walls of Roubideau Creek, lots of ponderosa pines, willows and cottonwoods against the entrada. By this time I was thirsty, my lone quart of water down to a few sips, wondering how sick I'm going to get if I drink the water out of that creekbed. I mean, your cows in my wilderness propagating the wild Giardia. I risked it, and also stopped to swim in cold potholes.

Down here it's a little different; signs of coons, cats and deer, and the ever present cow pie.

I stopped many times to read the RMP/EIS, translating from it heavy bureaucratics into plain English. And

the wilderness qualifications that you mentioned in the book are there, indeed. There's no competing for mineral, oil and gas uses, except for a three-B uranium rating. Hell, they can't even mine four-O uranium these days. There's no competition there.

The only competing uses I saw were cattle grazing, and off-road vehicles. In the Camel Back it's already over-grazed. In fact, your plans say you will reduce the grazing 7 allotment by 200 annual unit months no matter which plan is recommended. A good rancher that watched his land wouldn't put that many cows out there in the first place.

Yet you give the cows 6,402 acres, that's the best land, that's the top of Winter Mesa. What you allow the wildlife is the upper part of the Roubideau Canyon and on Camel Back, the steep, rugged places where those cows can't get at, and if they could, your cowboys would have a hard time getting them off of there.

As far as off-road vehicles go -- anyway, I think the grazing allotment, or allotments are wrong. There is no concessions whatsoever to wildlife.

On off-road vehicles, of the entire BLM Montrose District, 92 percent is being managed for off-road vehicles, that's stated in your book here. The Camel Back at 10,000 acres out of 480,000 surface acres is one quarter of one 137 percent, but you won't outlaw ORVs there, which you state

137 in the book will ruin the area's wilderness values.

You estimate the current 500 recreational visitor days to be 50 percent of ORV use, and you say managing the area for ORV use in the future will eliminate 250 primitive recreational visitor days. Well, that's all the primitive recreational visitor days. That amounts to zero primitive use of the area, people driven out by the raging six cylinder, duel carb, air polluting, earth crunching beasts. That combined with --

(Laughter.)

I had to get that one in.

But that amounts to single use, it's not the sacred multiple use verbage that gets passed off on us all the time. It's biased, it's one sided, it's off-road vehicle use.

Granted there are restrictions, but BLM has, what, one enforcement officer in the whole area. Without enforcement, there is no real restrictions. So I throw that out.

I quote from your book. "Not designating the Camel Back WSA as wilderness would lead to a gradual decline of the wilderness values throughout the WSA, primarily as a 136 result of increased ORV use." The impacts are to the soil, water quality, water salinity, vegetation and wildlife.

In case you forgot, when you went out there your mission was to study the suitability of the selected areas

for wilderness designation. And according to the Wilderness Act of '64, the designation is this, a wilderness, in contrast to those areas where man and his work is subjected to landscape, is hereby recognized as an area where the earth and its community of life are untrampled by man, where man himself is a visitor that does not remain. An area of wilderness is further defined to mean in the act an area of undeveloped federal land retaining the primeval character and influence without permanent improvements of human habitation subjected and managed so as to preserve its natural conditions and which generally appears to have been 136 affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable; has outstanding opportunities for solitude or primitive and unconfined type of recreation; has at least 5,000 acres of land, or is of sufficient size as to make practicable its preservation and use in unimpaired condition. It may also contain ecological, geological or other features of scientific, educational, scenic or historical value.

JOHN SINGLAUB: Five minutes.

CALEB GATES: Okay. I'm just going to close up.

Camel Back meets those criteria. Your recommendation of nonsuitable has no justification.

And I'll just read this one quote and leave it at that. There's a great deal of talk these days about saving

the environment. We must, for the environment sustains our bodies, but as humans we also require support for our spirits. And this is what these kinds of things provide. The catalyst converts any physical location, any environment, if you will, into a place that is a process of exoeriencing deeply. A place is a piece of the whole environment that has been claimed by feelings. Used singly as a life support system, the earth is an environment. Used as a resource it sustains our humanity. The earth is a collection of places. We never speak, for example, of an environment that we have known, it is always places we have known and recall. We are homesick for places, we are reminded of places. It's the sounds and smells and sights of places which haunt us and against which we often measure our presence.

With your resource management plan, that wilderness is going to look like this picture here, with the off-road vehicle running right through the middle of it.

Thank you.

JOHN SINGLAUB: Thank you.

Mark Paigen.

MARK PAIGEN: My name is Mark Paigen. I live in Paonia and I represent myself.

I also guide down the Gunnison Gorge, so I've been there quite a bit and I've seen it quite a bit over the last four years. I guess I'll talk about that first.

I think the Gunnison Gorge should be a wilderness area, I think the river should be included in the wild and scenic river act.

I think that the BLM needs to address how they are going to enforce regulations on private boaters down there.

Commercial boaters, by their very nature, protect the resource because it is their living. Private boaters, or walk-in fisherman don't have that at stake and can build large fires and the BLM basically can't do anything about it except ask them politely not to.

So I think they need to have some enforcement capability like the Department of Parks and Outdoor Recreation, which enforces the rules on commercial boaters.

As far as the other two wilderness study areas, the Badlands and Camel Back, I feel that both of them should be designated as wilderness. According to your draft plan here, both of them fit the criteria. I don't see why you didn't recommend them for wilderness.

As far as the Storm King area goes, I think that you're just skirting the issue, that you're saying basically for five years we won't decide either way and we will let the developers go ahead and then we will kind of see what happens. I don't really think that's what should be done, I think a decision should be made.

I've heard that it's a very important calving area

for elk and I think those types of issues need to be addressed and a decision made rather than just putting it off until the developers have put so much money into it that they can twist your arm and say "we've gone this far, we have got to continue."

I guess the last thing I want to say is that Delta County, Delta and Gunnison Counties are beautiful areas, and in the long term the economy is going to rely on that beauty more than industry, or I should say extractive industry. And to look into the long term for this area is to preserve the natural resources that we have in pristine quality, and that wilderness will do that very well.

Thank you.

JOHN SINGLAUB: Thank you.

GENE VECCHIA: I have a clarifying question, Mark. You kind of skirted around it, are you saying on the ski area issue that the BLM should make a decision against allowing the ski area --

MARK PAIGEN: Yes.

GENE VECCHIA: -- is that what you really mean?

MARK PAIGEN: Yes.

GENE VECCHIA: Okay, thank you. Good enough.

JOHN SINGLAUB: Thank you, Mark.

Gerrie Wolf.

GERRIE WOLF: I'm Gerrie Wolf, 706 2750 Lane,

Cedaredge, Colorado. I am speaking for myself, my husband as permitee on the BLM land in 4502, which is Leroux and 4549 which is the Dry Creek area.

Our first concern is with the access proposal in every one of your -- in every one of your proposals you have stated that you would like to acquire access to these lands.

I'm also speaking as a taxpayer and multiple user of that plan for recreation, for hunting, for grazing, and I do like the esthetic values that I get when I go out to take pictures. I do like to -- I am a photographer. And I don't like the trash, and I think that people have to be educated to pick up their stuff and to carry it out. If they bring it in, take it out.

On the Dry Creek and the Spaulding access proposal, we feel access to those areas would be unsuitable. BLM is unfenced, so that access would be to private land as well as your BLM land.

Maintenance of the roads fall to the landowners right now. The Dry Creek road, the first mile and a half is used for farm machinery and falls on private land. It is not surfaced. Opening the Dry Creek road into the canyon, it's very narrow and would impact the riparian zone that you're concerned about. It would be -- the things we noted was the salinity in the Dry Creek, which is also your Currant Creek. On your statement it is noted the Currant

Creek and the high salinity there. Opening up this canyon would impact that.

If you would open up this canyon to unrestricted hunting, which opens up Wells Hole from the bottom, you have a very limited, there's three spots in the canyon, plus what everybody else wants to open, where hunters can camp. All right. There's one spot in the canyon that is over-impacted because of hunting, the recreational value. I do not recommend opening up that canyon, it would also have an impact on the private lands. 9

Livestock grazing, we want to know -- our questions there, and we are not addressing specific questions, but our concerns, and on these access roads across the private property, will they be surfaced, will they be fenced? If somebody drives off into one of our irrigation ditches is there a lawsuit.

And we feel, with the exception of the access, we would like your present plan to remain the same, which I think is proposal A. We do not feel the State needs any more wilderness areas.

I personally have not been down in the Gunnison Gorge where these young people have been. I have heard of different folks going down there, fishing and so on, and they enjoy it. So I can't really speak too much about the Gunnison Gorge, but I do not like any more wilderness areas. 66

It is discrimination. It discriminates against the older generation. It discriminates against the handicapped, and our State has an abundance of wilderness areas now.

And I'm getting personally to the point where I'm going to retire one of these days and if I get to the point where I can't ride a horse I'm going to have to hike these areas, and I would like to be able to see them and enjoy them. And the people who drive through these areas do not cause a lot of destruction, it's the person who gets out and hikes and gets into the areas where the normal person or the elderly or the handicapped, the real young cannot get. 66

When I was younger I did do some of this hiking into some wilderness areas, and I -- some of our environmentalists are, in the days of the hippies, and it was -- they did not take care of what they did.

I know I'm in the minority right now at this meeting, but perhaps -- I think -- let me glance through this and see if there's anything else that I had on there.

I got carried away. I think that's it. Thank you.

JOHN SINGLAUB: Thank you.

Hank Hotze. Did I pronounce that correctly?

HANK HOTZE: Yeah, that's fine.

(Laughter.)

My name is Hank Hotze, and I live in Hotchkiss,

My Post Office Box is 604 and I'm reorganizing myself and a company by the name of Gunnison River Expeditions, who currently operates on the Gunnison Gorge, and its the oldest licensed outfitter in the Gunnison Gorge.

I would like to ask a question right off the bat, and that is it necessary that I make comments based on the modification to the administration of the Gunnison Gorge at this meeting, or will the written comments stand as my comments?

JOHN SINGLAUB: Written comments carry the same weight as verbal.

HANK HOTZE: So I don't have to waste everybody's time with my comments.

JOHN SINGLAUB: Correct.

GENE VECCHIA: Hank, are you talking about on the addition to the RAMP?

HANK HOTZE: Right.

GENE VECCHIA: That's a different document.

HANK HOTZE: A number of people are commenting on those issues and I --

GENE VECCHIA: Right. Those comments can be sent to Jon Sering here at the BLM Office.

HANK HOTZE: Fine. To be brief, the BLM, in my opinion is correct in suggesting that the Gunnison Gorge be designated a wilderness area, as well as a wild and

scenic river.

It's my perception that, based on what I've read in your Wilderness Supplement to the RAMP, the Adobe Badlands and the Camel Back or Roubideau also qualify for wilderness designation. And those areas are currently pristine, and they harbor lots of wildlife, and they are some of the best things in the area. And something that people continue to overlook is that those resources are finite. What we are designating here, we are determining that we should destroy something that can't be repaired, and these areas currently are not being used commercially to any value that we know of, and they should be preserved, especially in light of the decline -- some of the people in this room have a vested interest in these areas, and I apologize, but a fact is a fact -- that the decline in agriculture, and the decline in mining in the State of Colorado and the State Government's direction to promote tourism and recreation. These areas provide, or will provide the finest of those things. If we destroy them at this point for no real reason, as you have admitted in your plan, there's no real justification, then those areas will be gone. 68 136

We are seeing a tremendous increase, I'm a guide and outfitter, we are seeing a large increase in the area in interests in areas such as these, and they are bringing in tourist dollars. They are bringing in dollars that way.

They pay at the gas station and at hotels and restaurants, and they're buying crafts, and they're buying fruit and they leave, the people that hand out these dollars. And they give the local economy a tremendous boost, and if you destroyed these things you will never be able to bring them back.

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And there are lot of developed lands in Colorado, and I don't think there are enough lands that aren't developed.

Also these areas are providing, as I say, habitat for animals, and you know that hunting and fishing is a very large business and is growing all the time.

The other thing that I would -- another thing I would like to mention is that Storm King, the whole issue of Storm King should be brought out in the open and you all should make a decision, put your foot in the bucket and let us know what you're thinking, because Storm King to me -- I know that you can't make an economic judgment as to the potential benefit of a ski area to an area, but there are a lot of ski areas around the State that aren't doing well at all and that have destroyed some prime habitat and some beautiful acreage for the guess that there will be a tremendous future in skiing. And I believe that the Storm King is the same because of the competition that they are dealing with; Telluride, Crested Butte, the Aspen complex.

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You read in the paper all the time about Powderhorn, Powderhorn is dying on the vine, it's another mistake. Storm King will be another mistake.

The only other thing that I have to say is that as you make these designations, and as you make these suggestions, that BLM has got to take responsibility for enforcement. I know that you have an enforcement person, or maybe two, but that's not enough. There has to be money in the budget every year allocated to enforcement to maintain the integrity of these lands.

My other point is that some of these areas need maintenance, and you all -- especially in the Gunnison Gorge, that seems to be depending on the outfitters to maintain the place, and the outfitters have been maintaining it for a long time. But the BLM really has the responsibility. We are paying our taxes, and we are paying user fees and expecting BLM to take that responsibility.

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So, thanks for the opportunity to comment here tonight.

JOHN SINGLAUB: Thank you, Hank.

JIM FERGUSON: My enforcement, do you mean by citation type enforcement, or someone like the individual that we have had working there this summer?

HANK HOTZE: They have to have that dual capacity. It's a management emphasis that really should be oriented

towards education first and enforcement second. But they should have the dual capability.

JIM FERGUSON: You're thinking then of citations and --

HANK HOTZE: That would be the most efficient thing, to have somebody that could do both of those. Then you wouldn't have a couple, three or four people on the payroll, some doing some and some doing the other. Education is the key, but it hasn't worked so far.

JIM FERGUSON: Thank you.

JOHN SINGLAUB: Thank you.

Robin Nicholoff.

ROBIN NICHOLOFF: My name is Robin, R-o-b-i-n, Nicholoff, N-i-c-h-o-l-o-f-f. I'm speaking for myself and my family.

I thank you for the opportunity to comment on this draft EIS for the Uncompahgre Basin Resource Management Plan.

The first problem I encountered in reading this document was the extreme general approach to all resources, both in their description and management options, impacts and possible mitigation measures. I find it difficult to comment specifically on something that is so broad brushed in nature and which offers so little in way of detailed analysis.

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For example, I refer to the Uncompahgre Basin

resource area grazing EIS of 1978, which offered very specific conditions under which, for instance, the practice of chaining could occur.

Similarly you went to the Southwest Utah coal region REIS, it offers specific exclusions of areas of coal development, detailed mitigation measures, etc.

More recently the RAMP for the Gunnison Gorge gives the public precise conditions for the Gunnison Gorge -- excuse me, precise conditions that would result in, for example, the reduction of the number of commercial float trips through the Gunnison Gorge. And I would like to commend the BLM at this point for their analysis that was done in that RAMP.

This document, however, is totally lacking in such specificity, and consequently is probably in violation of the Federal Land Policy Management Act of 1976.

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Nonetheless, I offer a few observations which I'll try to keep brief. I'm concerned with the manner in which public access would be secured into various areas, specifically the Roatcap and Jay Creek area. The EIS does not indicate any consultation with private landowners. That leaves to a lot of questions. Will the acquisition be through purchase of rights of way or through condemnation. Once said rights of way are acquired, will the BLM be responsible for maintenance of them. Will BLM indicate

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which lands are private and which are public. How will restrictions of off-road vehicle use be enforced. The BLM personnel apparently have no citation authority, which makes enforcement extremely questionable. 9

On a right-of-way that passes through private land and accesses a public land, will BLM install culverts and other devices to control erosion and sediment loading of riparian zones.

These questions and others naturally occur in the minds of the public while reading this EIS.

The environmental impacts invasionary actions are simply not addressed.

I'm concerned with BLM's ability to follow its own regulations and constraints placed upon it by this and supporting documents. For example, the aforementioned grazing EIS states on page 1-39 that "equipment would reach the job site over existing roads or trails." And this is with regard to chaining and reseeding projects.

On page 1-24 it states "neither temporary or permanent trails will be constructed to fence sites, water developments, or vegetation conversion sites." And conversion sites include chainings.

The grazing EIS calls for fencing the south boundary of Roatcap/Jay Creek allotments, and for water projects to occur prior to vegetative manipulation, yet

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all of these and other specifications were violated when on September 19, 1982, bulldozers under contract to the Bureau of Land Management trespassed on that private land to begin implementation of the Wolf Park chainings project.

Page 4-5 of the Grazing EIS states that "if modifications are needed into existing AMPs, an environmental assessment report would be completed prior to implementation." Several days after site work had been done on the Wolf Park chainings, the BLM District Manager issued a NEPA categorical exclusion in flagrant violation of Federal law and agency recommendations or regulations.

I wish that you not misunderstand me, I'm not opposed to livestock grazing on public lands, nor to imposing--to improving grazing conditions for wildlife and livestock. I'm opposed to establishing regulations and procedures, priorities and plans for implementation of objectives, and turning around 180 degrees and not following them.

I point to that older document as a -- well, for obvious reasons, but partly in contrast to this current document. I feel that the EIS is inadequate in its laying out to the public what the agency wishes to do, how it will do it and the impacts, either positive or negative, of doing it.

68 136 Briefly on just a couple of other points, I can find no justification for not including the Camel Back and

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68 136 Adobe Badlands wilderness study areas for not recommending inclusion in the wilderness system.

I'm concerned with inadequate monitoring of oil and gas activities, particular in the Muddy Creek area. There have been instances of oil slicks in the Pacnia Reservoir and pollution has occurred to West Muddy Creek from oil and gas operations. There has also been illegal dumping of production water from oil and gas activity in the Peach Valley area, resulting in pollution of irrigation ditches.

On the Storm King ski area with the U.S. Forest Service's --

JOHN SINGLAUB: Five minutes.

ROBIN NICHOLOFF: Pardon?

JOHN SINGLAUB: Five minutes.

ROBIN NICHOLOFF: The U. S. Forest Service recently approved two new areas near Pagosa Springs, we are looking at the expansion of the Vail ski area by 50 percent, Powderhorn is expanding. There are many for sale signs at ski areas around Colorado. I just wonder, do we really need another ski area, specifically one that may impact critical elk habitat. 69

I guess since my time is up I'll defer other comments to written form. Thank you.

JOHN SINGLAUB: Thank you.

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John Green.

JOHN GROOME: It's Groome, G-r-o-o-m-e?

JOHN SINGLAUB: I guess it is. I'm sorry, did you catch my apology at the beginning.

JOHN GROOME: That's hard to read.

My name is John Groome and I live at Pacnia, and I would like to comment on three things.

First of all, I'd like to say thank you to the BLM for their wilderness designation for the Gunnison Gorge. I think it needs it. I think also the Camel Back and the Adobe Badlands meet all the criteria for wilderness. 68 136 Wilderness is a diminishing resource within this country, and we need to preserve all that we can.

And I'll make my comments very brief. As far as the Storm King ski area site, I cannot believe that the BLM proposes a five year grace period in which developers may proceed with the ski area, after which the BLM might not allow them to develop. I mean, if you know anything about 69 the way big business operates and money speaks, if the developer puts millions of dollars into an area over a five-year period, there is no way that the BLM will say no to the Storm King ski area.

Thank you very much.

JOHN SINGLAUB: Thank you, John.

Jerry Price.

JERRY PRICE: I won't take too much of your time. Jerry Price, Rancho. Colorado, I represent Whistling Acres Ranch.

I deal with a lot of things that we are talking about; we graze cattle, we raise crops, we hunt, we take people on off-road ventures, we do it all in the area, some of the area we are talking about.

A couple of things I wanted to comment on. Your access program has been brought up before, we have two and a half miles of access across our public lands to get to a few hundred acres of BLM. We pick up bushels of trash; beer bottles, cans, paper. We have deer shot right out in front of paying hunters, people that stop on your access road across our land and shoot them.

As far as our grazing, we do a lot of erosion control, we put in ponds that stop some of this erosion that people are complaining about that grazing causes. We seed. We chain. We put up fences. And we pay a fair amount of money to put those cattle on that land. All we read is articles about we get free grazing. I've put over $3,000 worth of my men's wages into taking care of a few hundred acres of BLM that I cross in three days and come back in two days.

We put in those same water ponds and the elk and deer that I make money off of my outfitting license and

having hunters come in, all those elk and those deer graze off from it. Drank out of those ponds. Down to my hay field and eat my hay.

And I know the Department of Wildlife says some of these people for that, but I like good, fat deer and elk to shoot in the fall, so we don't bother to put in to have them pay us back.

So I just think that a lot of people stand up here and say I've got mine, I want to stop everybody else from getting theirs, whether it be a conservationist, a rancher, a hunter, or who it is. Because we see something that we think we want is not a reason that we should shut out everybody else. I think we can work together.

We put some trails through these areas that maybe the term off-road vehicles isn't right, let's put a trail in that area that a vehicle should follow, let's make it a trail vehicle, whatever its classification might be.

The lady addressed us here a little while ago finds it very difficult to walk and go clear down into these areas that might be desinated wilderness. I'm all for wilderness, I get clear out in the middle of it on horseback and have some of the same feelings the other gentlemen do.

However, sometimes when I find one of them taking their cool din in the nice cold pocket of water, it makes my wife feel a little funny when they are guys and it makes

me feel kind of funny when they're women because they're not quite alone out there as they think they are. Most of them don't carry swimming suits.

I've rode my horse into campfires that some of these backpackers have put out there and they find out that they can carry a 16 ounce can of something out to the field, but they can't carry a 2 ounce can back.

I had to pay a permit to be there, and they inspect me real heavy, and if I leave my junk out there I get fined. I sometimes get fined for some of their junk, too.

So I think let's all look at the whole picture. I agree with some of the people that there's a lot of things that should be in this book that aren't there. There's some things in that book that shouldn't be there. You know, I don't want to be specific because I don't think the book was all that specific on some of the areas.

I see a lot of lines drawn across my private land, and everybody else's, that says that on this side of the line we can do this and on that side we can do that. Some of that land that you want to do things to isn't yours. Some of it's mine.

I think let's all look at the big picture. I think maybe if we sit down for a meeting like this, this one gentleman suggested earlier, you heard my grios and I

heard your gripes and if we put it all together we would get somewhere.

That's all that I've got to say.

JOHN SINGLAUB: Thank you.

Is there anyone who signed up to speak who would like to speak at this time?

In consideration of the hour, and the hardness of the seats, would the two or three individuals that I cut off like to have an additional five minutes to speak?

Bill?

W. N. BRUNNER: Pass.

JOHN SINGLAUB: Steve?

STEPHEN F. HINCHMAN: Pass.

JOHN SINGLAUB: I'd like to remind you again that written comments will be accepted until November 5th, they do carry the same weight as the oral statements received tonight.

I would like to thank all of you for taking your time to come here this evening, including BLM employees on their own time.

This concludes the hearing.

Thank you very much.

(Hearing adjourned.)

BUREAU OF LAND MANAGEMENT

UNCOMPAHGRE BASIN
RESOURCE MANAGEMENT PLAN
and
ENVIRONMENTAL IMPACT STUDY

SEPTEMBER 24, 1987
RAMADA FOOTHILLS HOTEL
LAKEWOOD, COLORADO
7:30 P.M.

officials of federal, state, or local agencies who wish to testify at this hearing?

(No response.)

MR. SINGLAUB: Okay. If not, I've had a request by a gentleman from Colorado Springs who'd like to get home before dawn to speak first. John Stansfield.

MR. STANSFIELD: Where do you want us to speak from?

MR. SINGLAUB: Could you come up to the podium please and state your name, address, and who you represent?

MR. STANSFIELD: My name is John Stansfield, S-t-a-n-s-f-i-e-l-d. I'm representing the Pikes Peak Group of Sierra Club. I'm the conservation chair. I'm also a member of the Canyon City District Bureau of Land Management advisory committee representing the interest of environmental protection.

I have 15 years plus of sporadic wilderness study experience on both national forest and BLM lands, and over the last 10 years most especially on BLM lands. I was also a member of the Montrose District Gunnison wildland and Scenic River Study advisory group when the study was first initiated.

I'd like to defer my comments and perhaps a little bit of the time involved in them on the RMP

recommendations to the comments of the Colorado Environmental Coalition. Kirk Koepsel will be presenting those later. I do have some specific comments regarding the recommendations in the wilderness supplement that I'd like to make.

First of all, I'd like to recommend the designation -- the recommendation and designation -- hopefully, in the future, along with many, many thousands of more acres in Colorado on BLM land.

I'd like to recommend designation of Camel Back, the Gunnison Gorge, and the Adobe Badlands areas as wilderness.

I have some general reasons for that. First of all, these areas, unlike all the other designated wilderness areas -- almost exclusively in Colorado, so far, and to a large extent in the west -- these areas are low elevation areas and in and of itself, for the geologic, ecologic, climatological reasons that low elevation implies are valuable in and of themselves.

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They offer diverse ecotypes, these areas, than currently exist in the wilderness system. Diverse geologic types than currently exist. More specifically, these areas offer winter range and winter recreation. They offer ecosystem diversity. They offer riparian habitat of a significant and different type. And these three areas hopefully can be protected by wilderness designation from

excessive ORV use, or any ORV use, and preserved for such valuable things, given their unique nature as scientific study.

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I have specific experience with two of the three areas and have read some about the Adobe Badlands. I would recommend Adobe Badlands on the recommendation of others and the readings and the slide shows which I've seen.

Gunnison Gorge is a unique area. The relationship of the river and the wild land surrounding that is a marvelous relationship and should, of course, be protected.

Camel Back is another area which I have personal experience. An area perhaps without the grand scenery of Gunnison Gorge, but with a grandeur of its own, and with a wild quality of its own in terms of opportunities for solitude for the kind of primitive recreation which I've experienced there. Gunnison Gorge is not only a wilderness candidate, but should be a designated wilderness.

Thank you very much.

MR. SINGLAUB: Thank you, John.

I'll now go down through the list of speakers in the order they signed in.

Carl Gerity.

MR. GERITY: Thank you for this opportunity to present these comments regarding the Draft Uncompahgre

Basin Resource Management Plan/Environmental Impact Statement.

MR. SINGLAUB: Excuse me. Could you give your name, your address --

MR. GERITY: I will. My name is Carl Gerity and I represent Quinn Coal Company. My address is 5932 McIntyre Street, Golden, Colorado, 80403.

The Tomahawk Mine which is operated by Quinn Coal Company is in temporary cessation and is maintained on a standby basis.

The mine is located in Section 10, Township 13 South, Range 95 West, Delta County, Colorado, on private owned surface and coal rights. Most of the lands surrounding this property are private surface ownership and have federal coal ownership. According to the current MT plat of this township, the federal lands in Sections 1 through 12 are all classified as coal lands.

According to the Resource Management Plan, the lands under discussion are classified in management units A-6 under the current management alternative, B-1 under the production alternative, C-24 under the conservation alternative, and D-15 under the preferred alternative.

First, the current management alternative. Although coal leasing is not excluded under the A-6 management unit, it is not a priority. Since the only

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federal interests in Sections 3, 4, 9 and 10, Township 13 South, Range 95 West is in the subsurface resources, and as these resources are contiguous to an operating mine, and as they are classified by GLO Order as coal lands, Sections 3, 4, 9, and 10 should be included in the management unit A-1 as are the adjacent Sections 2 and 11 to the east and Section 8 to the west.

Under the production alternative, the management unit B-1, as classified, is suitable for this alternative.

Under the conservation alternative, the management unit C-24, as classified, is suitable for this alternative.

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Under the preferred alternative, again, although coal leasing is not excluded under the D-15 management unit, it is not a priority. Again, as federal estates include only subsurface rights, and as these lands are contiguous to private lands with an operating mine, and as they are classified as coal lands by Governmental Land Office Order, Section 3, 4, 9 and 10, Township 13 South, Range 95 West should be placed into the management unit D-7 as are the adjacent Sections 2 and 11 on the east and Section 8 on the west.

Thank you very much.

MR. SINGLAUB: Thank you, Carl.

Bill Foreman.

MR. FOREMAN: My name is Bill Foreman. I live at 803 Ithica Drive in Boulder, Colorado.

First off, I'd like to say that I'm very pleased to see that the Gunnison Gorge has been recommended for wilderness protection designation by BLM. However, I would like to encourage additional recommendation of the other two large sites, Camel Back and Adobe Badlands for preservation and protection under wilderness designation.

One thing that was stated in the opening comments was that water quality is being impacted by the utilization in the area. It's pretty obvious that wilderness designation would help protect these areas from over-grazing and off-road vehicle use. And that's probably two of the major reasons why the soil is ending up in the water and the like, and the vegetation is being eroded. So I would like to encourage you to have these other two areas, Camel Back and Adobe Badlands, as protected areas.

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In addition, I'd like to recommend

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elimination of cattle grazing in two other important areas, Escalante Canyon and the Fairview Research Natural area. And as stated in the Draft EIS, in the whole Uncompahgre Basin, 95 percent of the land is being used for cattle grazing. That seems like an inordinately large amount of land being used for that purpose. I'd like to recommend substantial

reduction in that utilization for both cattle grazing and also off-road vehicle utilization.

Thank you.

MR. SINGLAUB: Thank you, Bill.

Kirk Cunningham.

MR. CUNNINGHAM: My name is Kirk Cunningham, I live at 680 Tantra Drive, Boulder, 80303. I'm conservation chairman of the Sierra Club in Colorado, but I'll be speaking for myself tonight, and someone else from the club should be delivering the club's comments in Montrose.

I'm here to lend my support on behalf of the three wilderness study areas that are mentioned in the document, and I would like to thank BLM for recommending Gunnison Gorge. I think certainly its notoriety as a possible wild and scenic river -- part of a wild and scenic river area -- certainly is its own recommendation, and the area itself deserves it just by itself on the basis of its own properties. I think that's a good recommendation.

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The other two -- see no reason from the document, to the extent that I'm familiar with it, to drop them. As far as I can see, there is no convincing or even no rationale given for dropping the areas. They do not seem to have any significant mineral conflicts. They seem to have reasonable wildlife and other natural values and other wilderness supplement values, and there is no good reason why

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they should be dropped out.

I'm not familiar with the areas personally, but I would like to be someday, and I would rather that they not be roaded (phonetic) or otherwise developed by the time I get there.

The three together only represent slightly under nine percent of the public lands, the BLM lands, in the resource area. I don't think this is too much to ask that we have those areas in wilderness.

I'd like to support also the recommendation in the document that there be two special areas protected, the Escalante Canyon and the Fairview Resource Natural area, although I think some tighter stipulations be placed on those, particularly for oil and gas exploration.

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And I will be submitting comments for the club as fer as water quality values and riparian values in the plan.

Thank you.

MR. SINGLAUB: Thank you, Kirk.

Todd Robertson.

MR. ROBERTSON: Okay. My name is Todd Robertson. I live at 6538 East Milan Place in Denver, Colorado, here tonight representing myself.

I'd like to start off by saying that I recommend wilderness designation for all three of the WSAs in

the resource area. I believe that as there's increased demands by the human populations in the State of Colorado, the few remaining primitive habitats and ecosystems that are found should be protected. I've been to numerous BLM areas on the Colorado Western Slope. I'm shocked by the amount of ORV use and its accompanying habitat destruction and visual degradation.

I would like to thank the BLM for its recommended wilderness designation for the Gunnison Gorge area and I also feel the two other WSAs should be recommended as wilderness areas.

Looking over the documents I found no reasons for the two areas stated as being non-suitable for wilderness areas. A few of the things in the Camel Back WSA that I thought should make it recommended for wilderness is to protect endangered plant species in the area. It would be an excellent habitat to introduce desert big horn sheep, it's critical for deer end elk in their winter range, and also habitat for cyotes, raccoons, and mountain lions. Also, if there is no wilderness designation on this area, it's likely that ORV use will gradually destroy wild values of the area.

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The Adobe Badlands WSA. A few things that I found why it should also carry a wilderness designation is that BLM stated in the technical supplement poor mineral development, as seen by four oil and gas wells that were dry.

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There is coal potential in the northern part, but the coal industry shows little interest in developing the area because of poor access. And, finally, this area also has threatened basin hookless cactus and endangered spineless hedgehog cactus.

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In addition, the plan states that WSA in the resource area would provide a season of use, mainly the early spring and late fall, in the winter time for recreation end, so far in Colorado, there is limited use during this time of year in the already designated wilderness areas.

A couple more comments on the proposed Storm King Ski Area. I feel the ski area would destroy the critical elk calving ground and also the Escalante Canyon proposed ACEC should be designated on the area to prohibit livestock grazing more then is said by the BLM, since the area is protected for the critical plant species. And I feel that increased or sustained cattle grazing on the area would destroy the resource.

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That's it.

MR. SINGLAUB: Thank you, Todd.

Earl Jones.

MR. JONES: My name is Earl Jones, I live at 3035 O'Neal Parkway, Unit S, as in Sam, 21, Boulder, 80301.

To start out, with regard to the RMP, I have to say that this is the most difficult RMP to read thet I've

seen yet and, as a result, I don't really feel I can comment on it at this point. I hope to submit written comments later on.

With regard to the wilderness technical supplements on the other hand, I do have some comments. To start out, generally on the subject of wilderness, my experience of the process of wilderness preservation in this country has tended to remind me of the line, "What's mine is mine, and what's yours is negotiable," in the sense that it seems that land that's been set aside for mineral extraction, for logging, for livestock grazing, that seems to be untouchable. But when we start talking about roadless lands that qualify for wilderness, everybody wants e little chunk of what's left. And so we look at these roadless areas. We take out a little chunk for minerals, and a chunk for logging, and a chunk for livestock, and most of the time whet ends up we decide or you decide isn't worth designating wilderness anyway because there's not enough left of it. And I don't agree with that. I feel that at some point, if we're going to be serious about protecting wilderness, we just have to say this is it. No more. We're going to save everything we've got left. Maybe we'll go back end look at the lands that have already been taken up, and maybe we can save some of thet and protect it, too. And I think that point has arrived in this country. And specifically with regard to

the Wilderness Technical Supplement here, I've looked this over and you've had your three wilderness study areas. There appears to be no reason not to designate all three of them as wilderness. Okay?

You're recommending Gunnison Gorge. I thank you for that. But with regard to the other two, looking at your own impact analysis in Camel Back, if we designate that as wilderness, you say it has no anticipated impact on mineral resources. It would have the same impact on livestock grazing as your proposed action. And with regard to recreation, there would only be, in essence, a shift from motorized to non-motorized recreation. And in there I see no reason not to designate that as wilderness.

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With regard to Adobe Badlands, yeah, designation of wilderness. Your own word, it would have a negligible impact on coal production. Otherwise, no impact on minerals. Same impact on the salinity and on livestock grazing as your proposed action, and the recreation would actually be significantly increased over the proposed action. Again, I see no reason not to designate that as wilderness.

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And so I hope you will reconsider and recommend all three of these areas for wilderness.

Thank you.

MR. SINGLAUB: Thank you, Earl.

Karen Molliver? I apologize if I

mispronounced your name.

MS. MOLLIVER: My name is Karen Molliver, M-o-l-l-i-v-e-r. I live on Flagstaff Star Route in Boulder.

I'd like first to express my approval of your decision to recommend Gunnison Gorge, but I'd also like to ask why not Camel Back and Adobe Badlands as well. According to the management plan, there are no serious conflicts. Attempts at oil and gas and coal mining weren't very productive. Obviously there is not very much timber. There's some grazing, but that doesn't seem to be in conflict with wilderness either.

Both areas have excellent wilderness qualities, as you stated in the management plan. They're primarily affected by the forces of nature. There are very few human imprints and outstanding opportunities for solitude.

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In addition, in each of these areas there's an endangered species of cactus which would really benefit from wilderness designation.

You stated in the management plan that whether these areas were designated wilderness or not would have no affect on the status of these species. I have a hard time imagining that ORVs and increased grazing wouldn't have an affect on these endangered species.

I'd like to also comment on two other areas of critical environmental concern, the Escalante Canyon. You

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don't have any strong restrictions on this area. I'd like to also recommend that you don't permit livestock, that you do a mineral withdrawal, and I guess you also want to improve camping and bathing facilities. I don't really think that that's appropriate in an area of critical environmental concern. And I'd like to recommend the same restrictions for the Fairview Research National Natural Area.

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These three areas together make up 8.6 percent of the entire area of the Uncompahgre Basin that you're looking at, and that's a really small amount of land to ask for, I think, for wilderness. The Forest Service -- 15 percent of the Forest Service area is wilderness, so what we're asking for is half.

I hope you take these recommendations into consideration. Thank you.

MR. VECCHIA: John, I have a question to clarify something. On the Escalante area and the other one, you said you wanted a mineral withdrawal. Is that total minerals or oil and gas or everything? You're talking about everything? Withdraw from total minerals?

MS. MOLLIVER: Yeah. I think they're really small areas.

MR. VECCHIA: You mean all minerals? That's all I needed to know.

MS. MOLLIVER: Right.

MR. VECCHIA: Yes.

MS. MOLLIVER: Thank you.

MR. SINGLAUB: Thank you.

Rocky Smith.

MR. SMITH: My name is Rocky Smith. I live at 1030 Pearl, Number 9, in Denver, and I'd like to talk first about wilderness. The need for wilderness I think has been pretty well established. We need to have some land that is off limits to development that we can say with confidence will not be developed and provide a refuge for all the development around it. Wilderness provides outstanding opportunities for primitive recreation and solitude.

Our existing wilderness system is okay as far as it goes. We have quite a few acres in the wilderness system and some yet to be determined, but most, not all, but most of our existing wilderness is what I call rock and ice. High altitude, high peaks, and that's very beautiful, but a lot of it is inaccessible in the winter basically unless you want to hike or ski a long, long way. Hike on snow shoes or ski. So there's definitely a need for the low elevation wilderness. As an earlier speak said, these low elevation areas often have different ecosystems, different geology, they're available for year round use. They often don't require a long, long hike because the areas are small, so they're available to a lot of people. And I think the BLM has

a responsibility to provide a certain amount of this wilderness for the people of Colorado and the people of the nation to use and enjoy and provide refuges from development.

In this light, the recommendations are not entirely to my liking. I do like the recommendation for Gunnison Gorge to be wilderness. This area is, I understand, quite outstanding for river based recreation and also land based recreation. I'm glad to see you recommended it.

68 I don't really understand, however, why the BLM did not recommend the other two areas for wilderness designation. There appear to be very few conflicts. Camel Back, especially, has low mineral potential. There are no existing leases or claims according to the Wilderness Technical Supplement. There are three species of threatened, endangered, or candidate for one of those listings, species of plants. And under the preferred alternative, this area would be managed, I believe partially for riparian management, which protects riparian ecosystems. And also there would be limits placed on off-road vehicle use. It

136 seems to me that wilderness would accomplish the same goals and probably do them just as well, if not better.

Also, I believe Camel Back is contiguous to some Forest Service areas on the Uncompahgre Plateau that were at one time recommended for wilderness, and maybe someday putting two wilderness systems. So I believe Camel

136 Back should be recommended for wilderness designation.

Adobe Badlands, 10,425 acres. This area does not have a great deal of conflicts either. The coal in the northern portion of the technical supplement admits that industry does not appear to be interested because there's no transportation system in place and there are no other mines in the area. There appears to be, at least theoretically, a moderate value for oil and gas. But there have already been dry holes and, therefore, industry does not appear to be too interested. So further activity is unlikely. The same with the mining claims. Additional activity is not expected

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Under the preferred alternative for Adobe Badlands, there would be salinity control measures undertaken, grazing would be reduced, and ORV use would be closed on 8,358 acres. And, also, somewhere in the RMP there's a mention of possibly establishing a herd of big horn sheep. I don't see why wilderness would not do the same thing and do it better. All of the things that would be undertaken under the preferred alternative could be accomplished probably better by wilderness designation.

A few other parts of the plan are of concern to me. The approval of a ski area at the Storm King Mountain

69 site appears to me to be unwarranted. First of all, we don't need another ski area in Colorado. We've got too many

69 already. For another thing, it may not ...ow very much there in quite a few years. Going to have trouble getting a ski area there unless someone's got an awful lot of water to make snow with. Also, the area is an elk calving ground. So I recommend that the BLM change this in the final RMP.

I also ask that you ban grazing in the Escalante Canyon area of critical environmental concern, and the research natural area, Fairview, both sections of it. And also withdraw minerals. I'd like to point out that almost the entire resource area is open to oil and gas leasing, and locatable mineral location, and to have an ACEC or an RNA and allow mineral location or oil and gas leasing

28 seems to me to be a contradiction in terms. If you have an area that for some reason has a critical environment, why do you allow destructive activities such as grazing, oil and gas leasing, and mineral location? And the same with the research natural area. If the goal there is to set aside an area that is primarily natural and research its scientific and educational attributes, if you allow destructive activities, it seems to me you're going to be defeating your purpose. And, therefore, I recommend that you make these changes in the final and I will be anxiously awaiting to see what you do.

Thank you for this opportunity to testify.

MR. SINGLAUB: Allison Graves?

MS. GRAVES: My name is Allison Graves, G-r-a-v-e-s, and I'm co-director of the Wilderness Study Group from the University of Colorado. My address is 585 Pica, Boulder, Colorado, 80302.

I'd like to recommend that Camel Back, Gunnison Gorge, and the Adobe Badlands be recommended as Wilderness. I recommend these due to their outstanding wilderness characteristics and the few conflicts of interest

68 within the areas. I don't really understand why they weren't

136 recommended due to the lack of conflicts in the areas and the admission that they do have good wilderness characteristics.

Also, I'd like to point out the presence of the spineless hedgehog and the knockless cacti in these areas. I know you put that in the technical supplement.

On the areas of critical environmental concern I would like to recommend new surface occupancy, no stock grazing, and a mineral withdrawal, total mineral

28 withdrawal. Also, the new camping facilities and bathing improvements I think are not compatible with the area of critical environmental concern.

I'd like to point out that the wilderness recommendations of all three areas is very small. Like was pointed out before, it's only 8.6 percent of the area and I wish it could be more. But if I can get that much, I'd like to take it.

I feel that wilderness areas in Colorado would help the Montrose area out. I feel that the Storm Mountain Ski Area development would also be incompatible with the elk calving grounds. And that's all I have to say.

MR. SINGLAUB: Thank you.

Steve Pettit.

MR. PETTIT: My name is Steve Pettit and that's spelled P-e-t-t-i-t. I live at -- well, I live a few places in Boulder, but you can reach me at Post Office Box 17126 Boulder, Colorado, 80308.

I'm mostly going to speak with regard to wilderness. There were three areas that have been studied and only one recommended, being the Gunnison Gorge, and I applaud you all on that. Two other areas being Camel Back and the Adobe Badlands, I've been to both and both offer quite unique characteristics for solitude and wilderness recreation.

The Camel Back area itself, I don't see why that wasn't included for recommendation. There are no mineral or timber conflicts with regard to the area. Also, you all are going to cut back on the grazing itself in the riparian area to try to avoid further damage to that. I think you all need to reconsider your -- I don't know if lapse is the right word -- but your failure to include both Adobe and Roubideau because I think a lot of people, if they go there, they could find a lot of personal benefit from both

those areas. And I hate talking in front of people because it just scares me. Thank you.

MR. SINGLAUB: Thank you, Steve.

Bruce Robson.

MR. ROBSON: My name is Bruce Robson. I can be reached at P.O. Box 17126, in Boulder, 80308. And I guess first I'd also like to thank you for the designation of the Gunnison Gorge, and I would also like to express my opposition to your not designating the other two areas, Camel Back and Adobe Badlands.

I have been to the Adobe Badlands and,as you found in your report, I also found nothing wrong with it. No conflicts as far as wilderness designation. So I guess I found it somewhat surprising that it wasn't recommended with no timber, no minerals conflicts, and with the cutback in grazing proposed. So I would like to recommend that you would designate those areas for wilderness preservation.

I'd also like to express that in the areas of critical environmental concern, I'd like to recommend no occupancy, mining withdrawal, and no grazing. And that the Storm Mountain Ski Area be proposed or that that be opposed in difference to the elk grazing land.

I also have problems talking in front of people. Thank you.

MR. SINGLAUB: You're among friends. Don't

worry about it.

MR. ROBSON: Thank you.

MR. SINGLAUB: Roz McClellan?

MS. MCCLELLAN: My name is Roz McClellan, R-o-z M-c-C-l-e-l-l-a-n. I live at 483 Marine, Boulder, 80302.

I wanted to thank the BLM for coming over from the West Slope to hold this hearing for us so we didn't have to come over and see you in Delta.

I've been following the BLM wilderness recommendation packets for about six years, and I think I've really never seen such lame reasons for excluding wilderness areas as I did in this particular Wilderness Technical Supplement. In cases like Bull Gulch, or Skull Creek, or Willow Creek, or other areas that have been excluded, at least in the preliminary recommendations, at least there's some pretext or some reason given for why they've been excluded. They're called mediocre, or maybe they have manageability conflicts due to boundaries that don't follow topographical lines, or sometimes there's a PLPMA release, or something like that. But read the technical supplement over and over again and I really couldn't find any specific reasons why these areas had been excluded. There were glowing descriptions of them, lyric, poetic descriptions of Came Back, and the opportunities for solitude, and for reintroduction of big horn sheep, and then I couldn't see the rationale for why the area

had been excluded.

It looked as if they are, in fact, going to be managed basically as wilderness, both Adobe Badlands and Camel Back. It seemed as if maybe one -- I guess I was going to say that even if Came Back were recommended, it would increase the recreational visitor days. According to the economic tables, that would be beneficial for the resource area. I think Camel Back would give 500 rather 300 recreational visitors days per year.

So I was feeling really perplexed. It looked like maybe you wanted to keep them open so you could do vegetative management to increase wildlife forage. But I think opening them up to ORV is just going to outweigh any advantages of being able to improve the vegetation.

So then it occurred to me that maybe it would allow more ORV use if you kept Camel Back open, but the figures were pretty negligible. So the only thing I could think of, which I'm sure isn't the case, but it looks as if some kind of quota system is being imposed from somewhere. I had the same impression in areas like San Juan, San Miguel, and White Snake, and Glenwood Springs, and Canyon City. Areas where large percentages -- up to 50 percent or more of the wilderness study acreage was excluded for no very conclusive, persuasive reason. And I don't know where, if at all, the quotas are coming from, but I'd like to say tonight

that I think that Mr. Morck, and Mr. Burford, and Mr. Hodel should know that you are nowhere near meeting any kind of wilderness quota in my opinion. And even if you were to designate or recommend all three wilderness areas for suitable for wilderness in the Uncompahgre Resource Area, that would still only give 8.9 percent of the entire resource area.

If you were to designate the entire 750,000 acres of potential BLM wilderness in all of Colorado, that is again only nine percent of BLM holdings managed lands in Colorado. And that 750,000 acres is only a little over half of the original, initial inventory of 1.3 million. And you're only recommending half of that or less.

What it looks like is that instead of dividing up the pie, you're dividing up a piece of the pie. And I feel that in terms of the need for wilderness for spillover of civilized humans and for refuges for wildlife who have only a few islands of protected habitat left, the quota is very much too low as it is.

If we go on to the State of Colorado, even if the entire remaining four percent of potential wilderness is designated, again, that would only give four percent added to the existing designated four percent. That's only eight percent of Colorado. That's 92 percent of Colorado that is now developed and will never again be wilderness.

Nation-wide, the figures are even more skimpy

and in my opinion insufficient. Two percent of the lower 48 I believe is wilderness.

I was going to bring tonight a map that shows that Colorado is one of only six or seven states with any existing or potential wilderness left in this country, and I feel that BLM has a responsibility beyond the boundaries of Colorado to consider that you have under your jurisdiction one of the few remaining potential wilderness resources left in this country. And for the sake of the rest of the country which doesn't have this resource, you need to widen your horizons. Not just think about how much the Uncompahgre Resource Area should have in terms of its needs, but what does Colorado need, what does the whole country need.

Over the last century a lot of people have had a chance to claim these areas. The homesteaders, and the loggers, and the miners, and the ranchers, and the OVRers, and the oil and gas leases. Everybody's had a chance to claim those three little tiny areas that you are now considering, and I would like to ask when we will decide that no one really wants them anymore. They haven't been wanted up until now. There's been plenty of reason to want them. No one has claimed them. I think now's the time when we can decide that no one really does want them, therefore, wilderness could claim them.

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I guess basically the way the technical

supplement reads now, I don't think your reasons for excluding those areas are defensible. I don't think they'll stand up with Congress or with some of the rest of us environmentalists when push comes to shove.

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As for the RMP, I didn't read it cover to cover for eight hours as I should have, but I do have a vague impression that it wasn't as clear as some of the others I've read. It took me about three-quarters of an hour to find figures on a number of ORV acres that would be precluded by designation of all three areas. And then when I found that figure and I compared it to the comparison chart, the figures seemed to be inconsistent. I didn't see clear charts as to how much oil and gas potential would be foreclosed by wilderness designation. I'd like to see more charts and more clear-cut figures showing what we're really losing by the designation of all three areas.

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MR. SINGLAUB: Five minutes, if you can wrap it up.

MS. MCCLELLAN: I think that's about all I had to say. I guess basically I agree with a lot of people in this room. I think you can designate a lot more and still not be anywhere near your quota.

MR. SINGLAUB: Thank you.

Norm Mullen.

MR. MULLEN: My name is Norm Mullen. That's

M-u-l-l-e-n. I reside at 955 Grandview, in Boulder, Colorado, 80302.

I would just like to urge that BLM recommend the three wilderness study areas for protection. I'm concerned especially about the Gunnison Gorge Wilderness Study Area. I've been the Gunnison Canyon but I have not yet been into the Gunnison Gorge. I would like to run the river. And I thank BLM for its protection or its recommendation and protection. I also urge protection of Adobe Badlands and Camel Back. I also urge that BLM consider protection of the adjacent Forest Service area on the plateau to Camel Back. I urge that BLM consider better protection of the ACECs of Fairview and Escalante, including no surface occupancy, leasing, mineral withdrawals, and limitations on grazing. And I urge that the Storm King Area not be recommended as suitable for a ski area development. I think there's enough ski areas in that section of the state currently. And I just want to thank BLM for coming over here to hear us comment on their plan and thank you for listening to my comments. I'll be probably submitting written comments in more detail later. Thank you.

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MR. VECCHIA: I have a question for Norm. You talked about protection of the Camel Back and Adobe. Are you talking about your recommending that we nominate them suitable for designation? Is that what you're saying?

MR. MULLEN: Yes. I'm sorry if I didn't make that clear. I support wilderness protection for both those areas as well as the Gunnison Gorge.

MR. SINGLAUB: Thank you, Norm.

Kirk Koepsel.

MR. KOEPSEL: I had prepared testimony a little longer than five minutes. Can I be deferred until the end?

MR. SINGLAUB: I'll give you a minute from John Stansfield. Would you like to be the last speaker? We can do it that way.

MR. KOEPSEL: Yes. Why don't we just do it that way.

MR. SINGLAUB: Okay. Martin Walter.

Can we take about a two minute break?

(Whereupon, a brief recess was taken.)

MR. WALTER: My name is Marty Walter. I live at 3333 Mevo (phonetic) Road and it's not in any town, but it can be reached through the Boulder Post Office, 80302.

I handed out this little sheet here, a map, which shows the USA at night. And it clearly shows that we wilderness folks are wimps. We lost the war. We've lost the war. There isn't much left to be preserved. And I've been to a lot of wilderness hearings in the past and it's the same old story. When you talk about wilderness designation, we

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wilderness wimps are arguing and pleading for 10,000 more acres in the Camel Back to be preserved, 10,000 acres in Adobe Badlands to be preserved, to go along with the 20,000 acres in Gunnison Gorge.

Those numbers might sound large until you compare them with the 200,000 acres that are going to be open to ORVs and the 190,000 additional more after that that will be open with some restrictions which weren't designated this evening. But they are in the report, presumably.

So, we have a single use. I see these ORVs, on 400,000 acres, tearing the place up. One-tenth of the amount of that land is preserved for solitude, science, archaeology and any of the unknown things that we might discover we wished we saved wilderness for at some later time.

So I'm pleading for the scraps. Okay? We've lost the war so we're pleading for the scraps. And to show you how much I'm committed, I didn't eat -- haven't eaten for the last eight hours. I can barely stand up here. I don't have any energy left. But I'm still pleading.

Camel Back. I overheard some conversations and so forth. You can't say it's not suitable. I mean, you might not declare it wilderness, but you just can't say this area is unsuitable for wilderness. You might say we don't want to make it wilderness or the Montrose County

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Commissioners don't want to make it wilderness, but you can't say that it's not suitable.

Some folks maybe don't want to preserve the wilderness because they want freedom to do whatever they want with this last scrap. Well, I want freedom, too. And there's a quarter of a billion Americans out there that some day are going to want freedom to see something that hasn't been trampled on or used. And the excuse that we have the Dominquez Canyon as a comparable area, even it was identically isomorphic, excuse me, to the Camel Back region, okay, so we have two of them. That's great. But the Dominquez Canyon, as I understand it, located in the Entrada sandstone in the Camel Back area is in a higher geological strada. So that's not a good excuse. I see there are no good excuses for not preserving this area.

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So, 8.6 percent. If we got all three areas, we're talking 8.6 percent. If only the Gunnison Gorge, we're talking four percent.

One last string of comments here. About the Storm King Area. The Forest Service right now is considering permitting for another 100,000 ski areas per day and this area doesn't compare with any of those. That's in addition to the roughly 100,000 ski areas per day that we already have. And this area doesn't compare to any of those areas in my estimation.

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So, I don't know. I'm just at a loss to figure out what else to do. I mean, maybe I should start building tactical nuclear weapons in my basement and get a few ORVs myself and mount them and go around and try to defend what scraps are left of the wilderness. But somehow I don't think that strategy is going to work. What we can do and what we pray is that there'll be enough public input on this, enough people that care to get these last remaining scraps preserved. Otherwise, we'll have Elway. We'll have just Elway. It's sad. Where are not totally civilized people like me going to go for the recreation? Thank you.

MR. SINGLAUB: Eleanor Von Bargen.

MR. VON BARGEN: My name is Eleanor Von Bargen. I live at 5555 East Yale, apartment 3, Denver, Colorado, 80222.

I'm here tonight representing the Colorado Native Plant Society as the president, and I want to thank BLM for this opportunity to comment on the Uncompahgre Basin Resource Management Plan.

The Colorado Native Plant Society will submit detailed written comments on the RMP, so I'll speak only briefly tonight about the provisions relating to plants.

We recognize that the endangered, threatened candidate, or sensitive plant species occurring within the planning area are known and we commend you for giving them

some consideration. We urge you to provide adequate protection for these species wherever they happen to occur. The Colorado Native Plant Society does support the designation of the Fairview RNA, the Escalante Canyon as an ACEC, as it's outlined in the preferred alternative, and we also would recommend Camel Back wilderness area and Adobe Badlands for wilderness designation, as well as Gunnison Gorge. 68 136

We request that you protect Eriogonum pelinophilum, Panstamon retrorsus in the Fairview Research Natural Area, Sclerocactus glaucus in the Gunnison Gorge Wilderness Study Area, Echinocereus triglochidiatus varinermis and Astragalus linifolius in the Camel Back Wilderness Study Area, Sclerocactus glaucus in the Adobe Badlands, and for the listed plant species and the unique plant associations found in the Escalante Canyon.

These are valuable resources. Once these plants are gone, you can never replace them. Just pause and think for a moment what the role of plants is, and where would you be without them.

We also comment you for your recognition of the value of the riparian ecosystem, and we urge you to adequately provide for its protection within your planning area.

I want to thank you again for allowing us to

come and present comments, and our written concerns will be forthcoming.

MR. SINGLAUB: Thank you.

Scott Hatfield.

MR. HATFIELD: My name is Scott Hatfield. I live at 1155 Marina, number 208, in Boulder, 80302, and I'd like to thank you for recommending the Gunnison Canyon for wilderness designation. And I think that the Adobe Badlands and Camel Back area should also be designated as wilderness areas.

I can see no reason in your technical report why they shouldn't be, and as long as you don't see any reason why they shouldn't be, I'm really surprised that you didn't recommend them to be designated as wilderness areas. 68 136

What's really of concern to me is what's going on with Storm King Mountain and the elk calving grounds there. People come to Colorado and they think that, you know, there's wild areas and, you know, they have visions kind of like Yellowstone Park a lot, and they'd love to see animals. And if you kill off their breeding ground, then we just will have a drastically less amount of this species. That is, the elk. And I guess it's not really proper to suggest that that be put up for consideration as being designated as a wilderness area, but I would like you to see if you can't manage Storm King Mountain as an elk calving 69

ground instead of a ski area. From what I understand, it doesn't even snow there a lot every year. 69

I'd like you to consider large game -- large animals I should say, instead of game, in most of your considerations of wilderness areas and breeding areas.

Thank you.

MR. SINGLAUB: Thank you.

Dave Allured.

MR. ALLURED: My name is Dave Allured. I live at 4231 Eaton Court, in Boulder.

I thank the BLM for this opportunity comment on their Resource Management Plan for the Uncompahgre Basin. I'd like to read through my specific recommendations first, and then say a couple general things.

I ask the BLM to manage the north and of Cimarron Ridge as a first priority, natural wildlife habitat. Most importantly, elk calving grounds. And second priority for primitive non-motorized recreation as appropriate, and specifically not for ski area development. I think that the area has important environmental characteristics in that there are several factors why these ski areas or ski area development in that area would be a bad idea, specifically, climate, economics, et cetera. 69

I recommend that you manage Escalante Canyon as an area of critical environmental concern. That's an 28

ACEC. That specifically it be managed for its wildlife values, undeveloped to recreation, and that you do not allow any mineral entry or occupancy in the area, and that you also allow no livestock grazing there, in both cases, to protect environmental values which I believe are very important. 28

On Fairview Natural Area, basically I have the same recommendations. Manage it intensively as a natural area, protect the wildlife and plant communities there, and prohibit mineral entry or surface occupancy, and prohibit livestock grazing.

I recommend that you designate Adobe Badlands and Camel Back as wilderness. I feel that their environmental values and their values for primitive and solitary type recreation far outweigh any possible alternative uses for these areas.

In general, first of all, I have noticed that of the 17 people, I believe it is, who have spoken so far, eight of them before me have pointed out in one way or another that either they don't understand your rationale for having excluded Adobe Badlands and Camel Back from recommendation for wilderness or, in generally, they don't understand your rationale for the general choices of management alternatives that you have made in your Resource Management Plan. 68 136

I have seen other BLM Resource Management 2

Plans and they include specific written descriptions of rationales. Those rationales are indeed missing from the written portion of this plan, and I am sorry to say that I view this as a fatal flaw in a plan that the public is supposed to be commenting on at this time. And I can refer you to specific RMPs in other BLM units that contain this element, and at least that provides the public and people such as myself an opportunity to see whether we agree with the judgments that you made, the values that you -- I should say your management team -- has made in selecting one alternative over another. And for those people who haven't -- some of these speakers that I've referred to didn't specifically notice -- okay. Some of them didn't specifically say the rationale was missing. They said they didn't understand it. A couple of people actually pointed out the rationale was missing. I think this flaw is so fundamental that I would recommend that you publish your rationale in as much detail as you see appropriate and provide for a second set of public hearings in the public areas that you've already identified for these hearings so that we may have a better opportunity to comment on rationales that, frankly, we don't see to understand right now. And that the opinions given forth, the testimony given forth in these hearings, be taken into account in your final Resource Management Plan.

Furthermore, I believe that, in general, the BLM and in particular some of the decisions about wilderness in this Resource Management Plan have misinterpreted the intent of the Wilderness Act of 1964. Specifically, the Wilderness Act specifies that certain areas should be selected because they provide outstanding opportunities for primitive recreation and solitude and other outstanding values, and that I'm afraid there's a gross misinterpretation of what outstanding means. I got an informal comment from one member of your team at the question and answer session earlier this evening. That the rationale against wilderness recommendation of -- I believe it was Camel Back WSA -- the two rationales given were one, that simply, the WSA was no longer adjecent to the Roubideau WSA in the national forest and, number two, the Dominquez WSA nearby had been recommended by the BLM for wilderness and that it was 70,000 acres and, therefore, there wasn't a need for recommending Camel Back.

First of all, I'm not necessarily going to construe if that that's the official rationale of BLM for making that particular decision about Camel Back. However, I will comment to those two points in the rationale.

I see no reason whatsoever that whether there's an adjacent WSA recommended wilderness area or not -- I see no reason for that having any bearing on whether an

area be selected, if the area by itself qualifies for wilderness designation. And, secondly, the proximity of the Dominquez recommended wilderness area, 70,000 acres nearby, I feel comes right back to what I'm calling this misinterpretation of the Wilderness Act.

The connotation there is that Camel Back is not unique or outstanding in the face of the nearby Dominquez recommended wilderness. I think that's extremely poor judgment simply because Camel Back is in its own self, it's in its own macrocosm, it's a unique area. The canyons there are different, the vegetation. The climate, et cetera, may be similar, but it's not identical. In the meantime, it is an existing primitive area that many people now treasure and many, many, many poor people in this country will treasure as time goes on as the opportunities for solitude and wilderness recreation and protection of wildlife in truly natural conditions gets less and less and less because of development in this country.

Take a look at the beautiful pictures on this wall in this room here. These show western desert scenes. Scenes of hilly areas similar to the Uncompahgre Basin Natural Environment. These pictures were bought by this Ramada Inn facility because these are the kinds of areas that many people in the United States like to enjoy for any of many values because they treasure the land in its pristine

and undeveloped state. You notice in those pictures there are absolutely no signs whatsoever of development in any form, and they're just another indication of how important this is.

In conclusion, I would urge the BLM to fundamentally reassess the way it now interprets the Wilderness Act and also I want to fully support your designation of the Gunnison Canyon for wilderness, and I thank you very much for that recommendation. Good night. Thank you.

MR. VECCHIA: I got a couple questions for just clarification.

MR. ALLURED: Fine.

MR. VECCHIA: Okay. When you started talking, you mentioned something about the north end of Cimarren Ridge or elk calving. Are you talking about the Storm King Peak area? Is that what you're talking about?

MR. ALLURED: I'm not sure. Specifically what I'm talking -- I didn't have very much time to read the RMP tonight. But I can specify them it in a different way. There's an area in the plan that specified for ski area development.

MR. VECCHIA: Okay. That's the Storm King Ski Area.

MR. ALLURED: And that's the area that I

recommend.

MR. VECCHIA: Okay. Another question just for clarification purposes.

MR. ALLURED: Yes.

MR. VECCHIA: You said something about the Escalante Canyon should be managed for the plants. Are you talking about the whole canyon or just the area that we outlined as an ACEC?

MR. ALLURED: I'm talking about the ACEC area.

MR. VECCHIA: Okay. Thank you.

MR. ALLURED: You said something there that implied miscommunication or misunderstanding of something that said. You referred to the recommending that that ACEC be managed for natural plant conditions. That wasn't exactly what my recommendation was.

MR. VECCHIA: I understand that. I just want to make sure I understand the area that you're talking about.

MR. ALLURED: I'm talking about the ACEC.

MR. SINGLAUB: Don Thompson.

MR. THOMPSON: My name is Donald Thompson. I live at 1201 Adams in Denver. I want to thank the BLM for having the hearing and thank you for your wilderness recommendation for Gunnison Gorge, and to add what probably other speakers have said tonight about the feeling that Camel

Back and Adobe Badlands need to be added also as wilderness recommendations.

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The other proposed use for these areas, in my way of thinking, would be more costly for the taxpayer in that a typical multiple use that the BLM would put these areas to would include substantial subsidies to ranching communities. I think that Colorado and the nation would be much better served by having these areas remain in their primitive, undeveloped, and wilderness use. The need for wilderness areas in Colorado is I think substantial, and out of 755,000 acres or whatever that is being covered by this management plan, the suggestion that forty something thousand be retained as wilderness to me seems only logical. Too often, unfortunately, the multiple use, which is suggested, turns out to be multiple abuse, and I think our country is not so poor but that we can put aside more area than is being proposed for future generations.

One of the things that always disturbs me in a management plan, especially on these two areas, Camel Back and Adobe Badlands, where I don't think that any other specific uses are being proposed, is the BLM and its employees are fallible and can make a mistake. I would much rather see that mistake made in making these areas wilderness. If that was or does turn out to be, and that later generations decide that it was a mistake to make Camel

Back and Adobe Badlands wilderness, that's something that could be corrected. If the BLM decides now that some of these multiple uses are appropriate there, the possibility of going back to wilderness qualities is substantially less.

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So basically what I'm saying is if we are going to make a mistake, let's make a mistake that can be corrected by future generations. Let's not take that decision away from them. Let's error on the side of too much wilderness. I can't conceive of how that would be possible with the small percentages that we're talking about. But I think that's a much safer decision for the BLM to make.

The proposed ski area -- all the things that I have read -- maybe the BLM has information I'm not privy to, but everything that I've seen in the Denver newspapers indicate that skiing and the demands for skiing, if anything, are static, and that the populations -- and of course this is what determines a lot of these things. The populations which are potential skiing populations, age, characteristics, and so forth is getting smaller. Some of the Forest Service areas are proposing additional ski areas. Many of the existing ski areas are proposing expansion. Even if there were no conceivable other use for Storm King Peak, I think a potential ski area would be idiotic, since it does have substantial uses, the elk calving area. The logic of not having it treated as such in the management plan really

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escapes me. I could maybe see if we were saying that this is some mineral value or this has some other values, timber value. But to say that this is a potential ski area to me is ludicrous.

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Anyway, I appreciate the opportunity to speak. I hope that the BLM will look at the paltry amount of wilderness being proposed out of this 755,000 acres, and I hope the final EIS will come to a better conclusion. Thank you.

MR. SINGLAUB: Thank you.

Has anyone else signed in to speak, Bob?

Is there anyone who'd like to speak who has signed not in except for Kirk?

MR. ALLURED: There were two over here.

MR. VECCHIA: Okay. Could you come and take your five minutes then? You may end up with five after all, Kirk.

State your name and I'll ask you to sign this afterwards.

MS. MILLS: My name is Polly Mills, P-o-l-l-y Mills. Address is 387 Ferrand Hall, Boulder, Colorado, 80310.

I'm currently living in Boulder, but I'm a New England native. I decided to come to college. I took a topographical map and discovered the Colorado Rockies and

decided to come to Colorado. I pay $13,000 a year to enjoy it. I've paid my $25 a day to go skiing in the Rockies. I love it. But the most impressive part of the whole state that I've seen has been the western slope, the Grand Junction/Gunnison River area.

The fragile environment, endangered cactus that's been talked about so often this evening, the limited and valuable water -- it's unique and has impressed me beyond belief.

These areas appraise the cities of and around Montrose and Delta to the State of Colorado and the whole united states.

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The WSAs in Colorado are like nothing in the east. The people of Colorado are extremely fortunate to have these unique areas and should wholeheartedly respect them.

I highly recommend and support the designation of the Gunnison Gorge, Camel Back, and Adobe Badlands in this area in the western slope as wilderness. I hope you take it into consideration. Being from a different part of the United States, forking out my money, that it's more then just a local issue here. I think it's important to recogniza the federal level.

You talked about having going to Congress, the Secretary of Interior, the President of the United States. He's mine as much as yours. And so are these lands

that you're talking about.

That's about all I have to say. I thank you very much.

MS. SPENCER: My name is Jenny Spencer. I live at 1055 30th Street in Boulder. I'm speaking for the Environmental Center at the University of Colorado in Boulder.

I would just like to say in lieu of the comments made for environmental protection of these wilderness areas that I support them wholeheartedly and that I thank you for designating the Gunnison Gorge area as wilderness. And I would also like the other two areas, Camel Back and Adobe Badlands to be designated as well.

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MR. SINGLAUB: Is there anyone else? Is there anyone who gave a statement who they feel I cut short and would like to finish up?

Kirk Koepsel.

MR. ALLURED: I appeal to your best judgment as moderator of this meeting to allow Kirk a good bit of time to say his piece, and I think that everybody here would be very impressed.

MR. SINGLAUB: Okay. We'll be out of here by 9:30. I hope you can make it by then.

MR. KOEPSEL: Okay. My name is Kirk Koepsel. I reside at 11608 South Apache Trail, Conifer, Colorado,

80433. I am representing the Colorado Environmental Coalition as their public lands coordinator.

I first had some overall impressions about the Resource Management Plan. I have found it to be very vague, much more vague than most of the other BLM plans that have come out. I think it's going to take a lot to get it into shape by the time the final EIS comes out. And that there's going to be some problems with not allowing the public to have the opportunity to comment on some of these major changes that I feel are necessary to have it comply with FLPMA and NEPA.

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One of the hardest things to deal with in this plan is it over and over again stated there will be substantial impacts, although these impacts are never quantified in the plan, which is amazing to me. Most plans really spent some time on quantification of the impacts.

I'd like to start out first with the coal management program proposed in the plan. Some of you may be aware that the Colorado Environmental Coalition had quite a history working with coal in the resource area. In 1976, we filed an administrative appeal on the land use plan for the North Fork Planning Unit in which we did win that appeal. In 1981, when a coal update amendment was prepared, once again we filed an appeal and there was a 50 percent reduction in the land being recommended for coal.

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One of my concerns about the plan, the way it's stated right now, is that the threshold concept was completely ignored. This is required under the Federal Coal Management Program, to look at threshold, socio-economic thresholds, wildlife thresholds, and I find the plan in violation of the Federal Coal Management Act.

There was a four fold increase in the amount of coal available for coal leasing. If current management were to continue in that area, there would be only 20,737 acres recommended for possible coal development.

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Under the preferred alternative, that increases to 83,334 acres which is the same as the production alternative. In fact, the conservation alternative, and I can't understand why this is called the conservation alternative, recommends 82,000. I don't see a whole lot of variation among the alternatives except for the current management.

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The plant states that -- this is an exact quote out of the plan. "The possible leasing of up to 5,730 million tons of coal would far exceed coal demands over the life of the plan." Then why are we leasing it? I don't think we need to lease for lease sake. I don't think we need to lease to keep the BLM employees who work in coal busy. I think that leasing needs to be based on demand. And I think we found that over and over again with what's happened

nationally when James Watt leased coal in the Colorado River Region at firesale prices, we saw the public outcry which happened there. That the government was not receiving the funds that should have been available or it should have gotten for that sale. And I don't think we should be letting this happen in the Uintah Southwest Region either.

I found the plan to be in violation of the Secretarial Issue Document which was realized in 1986 to get the coal plan moving again. It says that there will be an assessment of coal development potential. I did see an assessment there, but I saw it completely ignored in the recommendations.

Application of unsuitability criteria. I was unable to find that in the plan. I may have missed it, but it was obviously a small part of the plan.

Consideration of multiple use trade-offs were ignored once again. And the Secretary also outlined criteria for other issues that should be covered. Wet lands and riparian habitat, sole source aquifers, class 1 PSD areas, buffer zones to national parks. Once again, none of these issues are mentioned in the RMP.

I was shocked to see that the area above the Adobe Badlands, which is actually part of the wilderness study area, was being recommended as an area for potential coal development.

On page 4-63 it states that the mining of coal and the locatable minerals could result in the permanent and irreversible loss of ground water through diversion and subsidence. I think this is completely unacceptable and illegal contrary to the Federal Coal Leasing Program.

On oil and gas development I found that the decision of Connors v. Burford was once again ignored. Connors v. Burford says comprehensive analysis of cumulative impacts of several oil and gas activities must be done before a single activity can proceed. Well, there were seven paragraphs dedicated to the impacts of oil and gas development, and one dedicated to the cumulative impacts of that development. I find that totally inadequate.

Connors v. Burfurd talked of the role of the federal agency in the mismanagement of the oil and gas leasing system and stated that they have initiated a pattern of procrastination, not examination, of environmental concerns. And I think it's sought now in being included in the Resource Management Plan.

In fact, it's amazing to see what actually is being leased in the plan. The no leasing, only 20,100 acres was recommend for no leasing, which was the Gunnison Gorge Wilderness Study Area. And then the rest of it was all geared to leasing and some of it with some small stipulations. But really very little evaluation of coal

leasing was done in the plan.

I was also concerned about some of the tracts slated for disposal. There were sites within the middle of a large BLM tract of land in the Adobes outside of Montrose, and I question the disposal of that piece of land.

Under the specific management prescriptions, I think under the D-6 prescription which is a Wilderness Prescription for Gunnison Gorge, that we need to look at acquisition of private land in Red Canyon.

Under the D-9 prescription, the plan is supposed to address the site specifics of coal development on riparian and aquatic systems as required by the Secretarial Issue Document, and it hasn't.

Under the D-10 we oppose the proposed ski area on Storm King Mountain. No timber harvesting should take place either because of the importance of the area as an elk calving ground.

D-12 prescription is the Escalante ACEC. We support stronger restrictions or stronger restrictions need to be placed on livestock. In fact, we support an outright ban on livestock grazing in the small ACEC. We support a mineral withdrawal for hardrock minerals and no surface occupancy stipulation for oil and gas. Recreational uses should also be controlled, including a ban on hunting and some control on the bathing that occurs in the pools of

Escalante Creek to protect the resources there.

On the Fairview N and A, once again we support a livestock ban, a mineral withdrawal for the unit, and no surface occupancy for the oil and gas leasing.

The D-14 prescription, which is the Needle Rock Outstanding Natural Area, I think the BLM should look at acquisition of additional lands to improve interpretive opportunities of the unit and consider also a potential nature trail at the site.

On wilderness, we support all three units as wilderness. The Gunnison Gorge is one of the premier recreational places in Colorado. The ??givers??? from Black Canyon by having an upper canyon covered by sedimentary rocks which the Black Canyon lacks. The Gunnison River is also an incredible white water adventure, and it's an area that just recently I have gone with Jerry Mallett and visited and found it to be incredibly impressive. Adobe Badlands has impressive scenic values. It includes some endangered species including the Uintah Basin hookless cactus, and it would add, I think, some diversity to Delta's economy by increasing the recreational attractiveness of Delta.

On Camel Back, it's another area I've spent some time visiting and found the canyon to be spectacular and much different from Dominquez. Dominquez is the Entrada sandstone and the slip rock canyon very typical of Utah. And

Dominques or the Camel Back Unit in Roubideau Canyon just barely begins cutting into the Entrada and includes the upper layers of the ???mores?? and I think it's capped with the Dakota sandstone. So it's a much different unit than Dominques Canyon area.

It also has a very decent trail system for people that want to use it for recreation which very few of the BLM units have. It has impressive riparian areas and Winter Mesa is one of the prime locations for the spineless hedgehog cactus. The BLM plan also looks at the possibility of introducing desert big horn sheep into the area.

I was shocked with the figure that 82 percent of the resource area is going to be open to ORV use, basically uncontrolled ORV use, and think that there needs to be additional restrictions put on that.

I saw no delineation of utility corduroys across the BLM lands and those units, and I think that's something that needs to be addressed in the final EIS.

On threatened and endangered species, I think it should also be recommend in that area that an intensive survey and identification of areas which contain threatened and endangered species should be conducted. There's been no such survey yet on the resource area and it's something that's necessary.

And, finally, riparian vegetation, I found

some very different figures on page 2-8. It says the riparian acreage of the resource area equals 1,035 acres. And then on page 4-50 intensively managed -- they plan on intensively managing 6,320 acres of riparian zone to improve the vegetational characteristics, and then 4,000 acres will be open to mineral exploration. The numbers just don't jive.

There has to be very strict controls placed on both mineral and livestock uses in the riparian zones of the plan that we support. Very stringent controls on both of those.

I thank you very much for the opportunity to testify.

MR. SINGLAUB: Thank you, Kirk.

I'd like to thank all of you for coming out this evening and taking the time out of your schedules to give us these comments. I hereby conclude the meeting.

(Whereupon, the above-entitled matter was concluded.)

CERTIFICATE

This is to certify that the attached proceedings before:

BUREAU OF LAND MANAGEMENT

In the matter of: UNCOMPAHGRE BASIC RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STUDY

At Lakewood, Colorado, Date September 24, 1987

Was held as herein appears, and that this is the original transcript thereof for the file of the Department.

OFFICIAL REPORTER

PUBLIC HEARING TO RECEIVE INFORMATION AND COMMENTS ON THE ADEQUACY OF THE DRAFT UNCOMPAHGRE BASIN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, AND THE ACCOMPANYING WILDERNESS TECHNICAL SUPPLEMENT

BUREAU OF LAND MANAGEMENT

2465 South Townsend Avenue

Montrose, Colorado

September 29, 1987

7:40 p.m.

JOHN SINGLAUB, PRESIDING OFFICER

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who did not get a chance to ask questions prior to the hearing that the BLM staff will be available for informal questions and answers after the hearing.

Are there any elected representatives or officials of Federal, State or Local agencies who wish to testify at this hearing?

If not, we will proceed through the list of speakers.

Deborah Gore. If you will please step up to the podium and state your name, address and who you represent.

DEBORAH GORE: Would it be possible to put my name at the end of the list?

JOHN SINGLAUB: Sure.

DEBORAH GORE: I prefer not to start it.

JOHN SINGLAUB: Okay, Richard Gore.

(Laughter.)

We have got a lot of Gores on this list.

RICHARD GORE: I'd rather wait until later.

JOHN SINGLAUB: Kenneth Gray.

Could I ask you to come up to the podium and state your name and address and who you represent, please, if anyone.

KENNETH GRAY: I'm Kenneth Gray, I'm a permitee on the BLM and Forest. I don't have much to say that hasn't been said over and over, but when you cut the use of the

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riparian area to what they call 35 percent, I understand, you can't use the outlying areas hardly at all because by the time that you get that much eat up, they won't have gone back at all into the far reaches of the permit and the dry ridges.

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And that's about all I have to say.

JOHN SINGLAUB: Thank you.

Thomas Gore.

THOMAS GORE: My name is Melvin Thomas Gore, I'm an avid hunter, fisherman and general rubberneck, I like the scenery.

My statement is that in general I favor the current management alternatives with an exception, which I'll mention in a moment, and in specific I am in favor of the no wilderness alternative for the Camel Back wilderness study area.

The exception that I have is that off-road vehicles use should be curbed to designated roads only no matter what plan is chosen. And my feeling of it is that off-road vehicles increase destruction of vegetation and thereby stimulate more soil erosion, and as a side point, salinity. And finally because of stress and harassment of wildlife.

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I think I have been to an area that was public land that there was no restrictions on four wheelers and three wheelers, and I was appalled at the damage.

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And finally my statement is that as a recreational user of the public domain, my personal opinion is that all recreational users should be charged a day fee or yearly user fee.

As a businessman I know if you give something away it is not appreciated, but if you charge somebody something for it, by golly, they are more likely to take care of it and appreciate what they've got.

Hunters, fisherman and perseer of scenery have had a free ride all of these years, and the other interest such as timber and cattle grazing, not only do they pay income taxes, which is what the first thing a recreation user will tell you, I have a right to use this land because I pay income taxes. Well, so does every timberman and so does every rancher, and they have to pay additional fees for what they harvest.

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So I think that any recreational user should be charged, that way they will appreciate and take care of it more.

So in summary, I think that off-road vehicle use should be curbed in all management systems, and the recreational users should be charged.

Thank you.

JOHN SINGLAUB: Thank you.

GENE VECCHIA: One question, Tom. When you talked

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about curbing ORV use, are you talking about the entire planning area, or just certain specific areas?

THOMAS GORE: No, sir, the entire planning area. I am just appalledat the at the damage these darn things can do.

GENE VECCHIA: Thank you.

JOHN SINGLAUB: Jo Gore.

JO GORE: You're getting rid of the Gores in a hurry here tonight.

(Laughter.)

Jo Gore, 445 Highway 348 in Delta, I am a permitee.

I am opposed to Camel Back used as a wilderness area, recommendation as a wilderness area. The Camel Back does not lend itself as a wilderness area. It certainly would be hard to manage, and it is not -- does not meet all the requirements of the wilderness.

Livestock grazing on these lands certainly enhanced the areas, they harvest the grass. When they harvest the grass, they prevent buildup of vegetation that could lead to dangerous fires. We have had a lot of fires in the State this year, so it would certainly get rid of a lot of that danger.

The riparian habitat, where they have proposed that on the Roubidesu area, to begin with, I always thought that a riparian habitat had to been in an area where there

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was water. The Roubideau goes dry and is dry many months out of the year and would not lend itself. Then when they have a hard rain up above, the water comes down, or the floods come down and wash the dry sand and gravel and rock, so the Roubideau should not be into riparian habitat. If it was into a riparian habitat and properly managed, it would increase the AUMs rather than decrease the AUMs as proposed for the area.

Livestock have been a great asset to building and reseeding of seeds and grasses. The cactus that they say is in danger of being eliminated because of livestock grazing, the livestock is what spreads the cactus, they

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step on it and move it and it takes it along to another area and that cactus has increased in that area, there's a lot more of it than there was a few years ago.

I would urge you to continue the multiple use management of these lands as they are in use now.

I would also like to see the recreationists and the backpackers pay their fair share of use of the public lands. They have had the use of the public lands all of this time, never paid one cent for management. Livestock,

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mining, timbering do more than pay their way of the use of these lands. And I would certainly like to see the other people using the lands start paying their fair shara.

Thank you.

JOHN SINGLAUB: Thank you.

W. A. Hamilton.

W.A. HAMILTON: I would like at this time to forfeit my time because there are many more livestock men here. If there is still some time at the end I may say something.

JOHN SINGLAUB: Mark Pearson.

MARK PEARSON: My name is Mark Pearson, my address is P.O. Box 204, Grand Junction, Colorado, 81502. I am speaking tonight as the Chairman of the Rocky Mountain Chapter of the Sierra Club, which includes 7,800 members in Colorado, among them are approximately 175 members in the Uncompahgre and Gunnison Basin or Gunnison River Basin area. Sierra Club members regularly use the public land of the Uncompahgre Basin resource area, primarily for recreational purposes. For example, we have sponsored outings in recent years to all three of the wilderness study areas; the Gunnison Basin or Gunnison Gorge, Camel Back and Adobe Badlands.

The Sierra Club strongly endorses BLM's preferred alternative recommending all of the Gunnison Gorge for wilderness designation. BLM is well familiar with our support of the wilderness designation of the Gunnison Gorge through our participation in the ongoing efforts to fashion the Gunnison Gorge Wild and Scenic River Bill and Wilderness

Bill.

We are extremely disappointed, however, with BLM's unsuitable wilderness recommendation for Camel Back. The Wilderness Technical Supplement makes clear that there are no significant resource development conflicts with wilderness designation of Camel Back. There's no timber or mineral resources of any value present. Instead BLM notes that there is an impressive array of wilderness dependent values in the area, including critical winter range for big game herds, habitat for threatened species, including rare plants and Golden Eagles, and habitat for threatened cactus as well.

All of the these features, plus a whole bunch of other ones that are obvious to anyone who goes up there, including the spectacular scenery, a pretty substantial

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perannial stream, the historic site of Ben Lowe's cabin, and other unique features such as the tremendous hoodoo right there below the Camel Back that's made out of unconsolidated sediments, just capped by a big piece of entrada sandstone. It just towers there without tipping over, which is quite impressive.

All this evidence demands that the BLM reconsider its recommendation and find Camel Back suitable for wilderness designation. The alternative is the continued, piecemeal erosion of the wilderness qualities there as ever

increasing pressures are put on by more and more ORV users, by fuelwood cutters, and other sorts of motorized activities.

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Camel Back also because of its seven or eight mile stretch of Roubideau Creek offers an unparalleled opportunity of what is probably the longest undeveloped drainage on the entire plateau. The creek starts in the aspen and spruce way up on the divide of the olateau and orovides a roadless continuum all the way from the divide far down into the dry desert of the Gunnison River country.

We also, the Sierra Club also supports the Adobe Badlands for wilderness designation. As with Camel Back, there are no substantial reasons given in the Wilderness Technical Supplement for BLM's non-suitable recommendation.

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BLM seems not to appreciate the Badlands wilderness, given the fact that the Montrose District did not recommend Mekenna Peak for wilderness, either, when it has the opportunity.

Finally, we urge the BLM to reject the proposed Storm King mountain ski area in this land use plan. The RMP's proposal to place the ski area proposal in administrative limbo, neither outright approving or denying the proposed ski area, is a silly non-decision. The reason for

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writing the resource management plan in the first place was to provide some guidance to BLM managers for evaluating

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resource conflicts and to allocate resources based on the analysis of those conflicts.

69 So the RMP should make a decision about whether Storm King Mountain is better suited for a ski area or for elk calving habitat, and by avoiding making that decision the BLM has kind of missed the point, it seems of the land use planning process in the RMP.

So in this case we would encourage the BLM to deny the Storm King ski area on the basis of a lack of demonstrable need for an additional commerical ski area in the area, the lack of demonstrable financial capacity of the proponent, and due to the impacts it would have on the big game herds in the area.

The Sierra Club will be submitting in-depth comments on these issues here and a bunch of other ones in the RMP before the November the 5th deadline.

Thank you for your attention.

JOHN SINGLAUB: Thank you, Mark.

Hank Davis.

HANK DAVIS: I would like to wait until later to make a statement.

JOHN SINGLAUB: Sure.

Eleanor Walrod.

ELEANOR WALROD: I'll wait for the question and answer session.

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JOHN SINGLAUB: It's either Les or Lee Hamilton.

LES HAMILTON: My name is Les Hamilton, my address is Post Office Box 764, Delta, Colorado. I represent the Uncompahgre Cattle Company, which has a permit that borders a portion of the Camel Back wilderness area. A couple of things that I would like to bring to the attention of the BLM is I was down through the area that you want to designate a riparian the other day, the creek was dry in several places down through there. It was mostly just potholes at that time.

I had occasion to ride through an area that has not -- has been taken away from access from livestock for the last few years, and the fire danger down that area from Criswell Creek up, I would estimate, would be in the extreme category. It is very dry and it's very overgrown.

I think that the Camel Back wilderness area, proposed wilderness area should be designated as multiple-use area, that we should continue with the permits the way they are. There is ample room and ample resources for both the recreationists, the wilderness appreciators and the multiple users presently using that at the present time.

The cattle will not come in and use 35 percent of the forage and be able to utilize any of the outlying areas, 121 as Mr. Gray said. They will come in there and by the time they use that 35 percent, they will not have been able to go

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121 back into the country and utilize any of that at all. So I urge the BLM to just continue with it the way that it is.

Thank you.

John Musser.

JOHN MUSSER: John Musser, 704 650 Road, Delta, Colorado. I'm a rancher. My family has been on that ranch for four generations. I think you find most of the ranches in the room, the families have been on those ranches for two or three or four generations.

When you talk about taking away livestock permits, or cutting to 35 percent use, you're talking about taking away a lot of heritage of the area. You're talking about taking away some income that comes into the area both to the BLM in terms of grazing fees and to the economy of the area in general.

I'm saddened that in nearly all of these alternatives it is recommended that livestock use be either cut or curtailed. I recently attended a seminar on holistic resource management along with several of the BLM employees. I'm sorry to say that those that probably should have attended did not.

It appears as though for several years now we have been going the wrong direction. We need to increase live-
134 stock use with intensive management rather than decreasing livestock use to get the ground cover that we need in those

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134 areas, and especially the riparian areas.

I've invited several BLM employees, and none of them have accepted my invitation to show them areas in the Escalante Canyon and the Little Dominguez that have had basically no livestock use for many years now and they continue to deteriorate. They're growing up with sagebrush that's too big for deer or elk habitat and they constitute a fire hazard, I think.

But worse than that, those areas that have not had any livestock use show by far more erosion than those areas that are overused. And I'll admit that there are areas that are overused. I mean, anybody can see that.

But I think that we need to take a long, hard look at our thinking. There is evidence now that shows that it's not over -- well, I can't say not overuse, but that over, over rest can be just as detrimental to the vegetation as overuse.

I just really urge the BLM to really take a long, hard look at this idea that in order to improve vegetation 121 that you have to curtail livestock grazing, because I think we are going the wrong way. I think what we have done in the last 20 or 30 years shows that.

I will have more written statement, thank you.

JOHN SINGLAUB: Thank you, Jim.

W. W. Rule.

WALTER RULE: My name is Walter Rule, Box 67, Ouray. I'm a member of OCA, which is an Ouray County Alliance that's involved with environmental and consumer oriented affairs.

I'm not speaking for the group, the group has not met or issued a position on this particular plan at present.

My comments will be limited mostly to the wilderness proposal and Storm King, although the management philosophies expressed about those areas can and does apply as a whole to the Uncompahgre Basin.

I spent approximately ten years in this area from the late 60's through the late 70's as a public land manager myself. I'm familiar with the areas and the values and the issues that are concerned here with all of the groups that have spoken.

We returned about ten years ago to the Ouray area and I'm retired there now and I've listened with quite a bit of interest here to the people like the Gores and Mussers and others that show a real concern for the land.

The ORV situation is something I think you really need to get a handle on in this area before it becomes worse than it presently is.

The history of public land in the West is principally guided by the need of the people who live here and the country as a whole. Timber, minerals, grazing and water

have always been major concerns of the people in this area, both for their own livelihood as well as basic resources for the country.

In the past two decades in the United States, however, what we call wildlands have undergone a little bit different viewpoint. People began to realize that there is a little bit more to our wildlands than what we can extract from them monetarily. There is a realization that the private lands that we have that have these values now have largely lost those values, and that the public lands; the national forests, park and BLM managed lands are the last repository of what might be called reservoirs of environmental quality. Qualities that no longer exist in many of the other areas, they are places of refuge not only for wildlife, but for people who get tired of the pressure of the technological world and are mesmerized by machinery and everything else. They want to get away and can't get away. They want to know that there are places they might be able to go to if they wanted to.

Consequently, the pre-eminence of the commerical idea about resource values, timber, minerals and grazing, and even water to a degree, has changed. And with the possible exception of water, upon which most of the other resources depend, the other values have declined in terms of much of the public feeling about where the values are.

There's a feeling that we need to retain the few remaining reservoirs of environmental quality in the United States as a whole, and this has emerged as a growing, if not a dominant, need.

In the case of water, which is so necessary for agriculture and industry outside the public lands, where it often rises out here, the mining, grazing and timbering may represent a real threat to the quality and quantity of that water.

For those of you with concerns, and with this value structure, the so called wilderness system seems to be the only avenue to assure even a short-term solution to the historic exploration -- exploitation, rather.

Appropriately, the Federal agencies have offered wilderness as an alternative, especially since their management procrastination and practices over the years have demonstrated, unfortunately that the quality of the forest and grazing land and the mineral resources, the protection of those, has been marginal, at best.

It's not surprising then that the wilderness alternative is perhaps the best alternative for all of us. In some respect it's a refuge for the agencies. With the strong political and economic pressures they get to use and develop the land, the wilderness classification, which can only be changed by Congress, takes the pressure off of them

in terms of that kind of development.

For the units involved in the Uncompahgre Basin, the wilderness study and the economic losses that might occur in timber, minerals and grazing are important to certain individuals, and some of you who have been on the land for many years. When they are added in total, they are a very small part, and might be called minimal.

68 136 The potential positive effect on wildlife and water, for the protection that wilderness might give them under the present system, could be very significant in the long run. It seems only practical, logical and resource-wise then to provide and to propose the Camel Back, Adobe wilderness study areas be added to the Gunnison Gorge in wilderness classification.

A brief word about Storm King. The same rationale applies to Storm King.

JOHN SINGLAUB: Five minutes, Mr. Rule.

WALTER RULE: I'll finish up in about three seconds.

JOHN SINGLAUB: Please.

69 WALTER RULE: Colorado already has enough economically marginal ski areas. The elk herd and wildlife habitat in this Storm King area in the long run is a lot larger and greater value to all of us than a ski area which might be very short term and an economic disaster. We should

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69 capitalize on the natural resources that we have that are in their existing form and not look for short-term answers of exploitive nature for the potential of what we have got.

Thank you.

JOHN SINGLAUB: Thank you.

I apologize if I mispronounce your name, some of these are hard to read. Linda Delmar.

LINDA DELMAN: Close.

JOHN SINGLAUB: You know who you are.

LINDA DELMAN: My name is Linda Delman, D-e-l-m-a-n. I live at 1317 Avon Drive in Montrose. I'm hear speaking for myself.

I would like to say that I'm pleased that Gunnison Gorge was designated as a wilderness area worthy of wilderness designation, but I would also like to say that I am disappointed that Camel Back was not and that Adobe Badlands was not. I noted, as well as some of the other speakers, that there was -- there seems to be no significant conflict 68 with timber resources or mineral resource development in 136 those areas, and I think that the values that are there in terms of scenic values and opportunity for solitude, which I think is becoming much more needed as our society grows, and wildlife habitat, and the cultural resources there in those areas make them eminently suitable for wilderness designation.

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In terms of cultural resources, I'm a member of the archeological society and I have spent a good deal of time on the Uncompahgre Plateau, and I'm aware that there are lots of cultural resources out there, most of which haven't been surveyed, but I come across evidence all the time. And I think that in particular archeological sites are subject to 68 more damage and degradation in areas where there are -- 136 where there is a lot of motorized travel, because it makes the access easier, and there is just more people up there.

And I think that it would be a wonderful opportunity to preserve some of these archeological sites, or at least mitigate the damages. If we had more of these wilderness areas in this kind of environment, like Adobe Badlands and Camel Back, because with the lack of motorized vehicles I think we have an opportunity to at least preserve what's there long enough to survey and see what it is.

In closing I would like to say that I also am a skier and I am opposed to the Storm King ski area develop- 69 ment. I think that the elk habitat and the elk calving grounds are much more important to us in the long run than another ski area.

That's all.

JOHN SINGLAUB: Thank you.

Bill Harris.

BILL HARRIS: My name is Bill Harris, I live at

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1605 South Mesa in Montrose.

I'm Vice President of the Colorado Archeological Society, and I'm speaking for the Chipeta Chapter of the Colorado Archeological Society which is based in Montrose. The Chapter is 52 years old.

The rate of destruction of the archeological resources on BLM lands in the Uncompahgre Basin is alarming. Vandals have laid open most of the rock shelters, and many of the surface sites that contain valuable information about the basin prehistory. Many historic sites have been picked clean and/or been destroyed also.

If the current trend of destruction is not reversed, there will be precious little cultural resources to provide enjoyment to the public and undisturbed sites for scientific investigation in the future.

The Chipeta Chapter of CAS recognizes that the manpower and budgetary constraints placed on the BLM cultural resource managers effectively reduces the quality and the quantity of cultural resource protection. But the ultimate result of this destruction is also unacceptable and unthinkable. Strategies must be developed and implemented that reverse the current destructive trend.

I have some suggestions. The use of available data has a baseline resource for protective strategies. For example, a survey -- there's a publication put out by the

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BLM called Cultural Resources Series No. 11, it's entitled the survey of vandalism to archeological resources in Southwestern Colorado by Nickens, Loraldy and Tucker. This particular volume gave a good overview of vandalism and what could possibly be done to stop it.

My second suggestion is to identify high sight density areas to search out archeological resources in areas that have received little attention. For example, low sight density areas, places of low profile, benches overlooking major drainages, and areas covered by fluvial deposits.

Emphasis should also be towards protection of undisturbed sites and mitigation of sites that have been disturbed, but have a high potential for recoverable material.

My third suggestion is in the area of public education. The BLM should implement a more progressive public 124 education program that emphasizes the vandalism problem and the need to protect and conserve cultural resources.

The Colorado Archeological Society recognizes the only long term solution to vandalism of cultural resources on public lands is public education, and has recently elevated public education to a committee responsible to a State Board of Directors. This committee, among its other activities, will work closely with Colorado -- will work

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closely with the Colorado Office of Archeological and Historic Preservation, and it also looks forward to cooperation between other organizations and other agencies. It looks to that as a high priority.

The Chipeta Chapter of CAS commends the BLM in regard to its recommendation to the RMP draft, preferred alternate, to conduct a Class III inventory of the 5,840 acres.

The Chipeta Chapter would also like to recommend that BLM expand their search for high value sites on BLM land between Highway 90 on the east and Roubideau Creek on the west. High value sites and high density areas should be given long-term protective classification. The RMP should also include provisions for research projects by legitimate, professional and amateur archeological groups.

In closing the Chipeta Chapter would like to participate in the BLM's cultural resource management to the extent of its members' physical, temporal, field experience and financial capabilities.

Thank you very much.

JOHN SINGLAUB: Thank you.

Stuart Krebs.

STUART KREBS: My name is Stuart Krebs. S-t-u-a-r-t K-r-e-b-s. My mailing address is Box 776, Montrose,

I'd like to start by commending the BLM for its

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recommendation that the Gunnison Gorge be considered suitable for wilderness. I'd also like the BLM to consider the Adobe Badlands, reconsider them as suitable for wilderness, and I intended to also recommend that Canel Back be considered for wilderness too.

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I wonder if -- I don't remember all of the regulations that we heard at the beginning of the meeting, but I wonder if it's appropriate, I'm sure in the documents we have that it tells this, but I'm curious if we could get a little clarification on just what wilderness designation of that area would change in the way of grazing use. Is it okay to look at that real quickly, I'm going to talk --

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JOHN SINGLAUB: You can talk about that after the meeting, if that would be possible.

STUART KREBS: We couldn't use part of my five minutes to --

JOHN SINGLAUB: I'd rather not, no, if we can confine this to your testimony I would appreciate it.

STUART KREBS: Okay. I guess the last thing that I would like to say is that I would look at that a lot harder and see if there really is a hardship to the grazing permittees up there. But if there is not, I think that area should be considered for wilderness as well.

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Thank you.

JOHN SINGLAUB: W. D. Wetlaufer.

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W. D. WETLAUFER: I'm W. D. Wetlaufer, 16574 6450 Road in Montrose. I'm representing myself, my fishing and hunting interest and Western Colorado Congress.

I'm especially interested in the efforts to create a wild and scenic river in the Gunnison Gorge. The geological, the environmental, the wildlife and recreational opportunities there are something unusual. For myself that's the thing that's kind of stuck with me when I first came to Colorado from the great State of Texas to make the great State of Colorado even greater. Anything more I can do, I'm here to do it.

And I think that the tourist trade in this part of the State is something that people should take advantage of. This is something that doesn't exist every place, and people come through here from the eastern part of the State where they look at the gorge over there, and the Arkansas River where they have to pay to get in. And they come through this area and tear off their stickers after they take a trip up to the Black Canyon National Monument.

Thank you very much.

JOHN SINGLAUB: Thank you.

GENE VECCHIA: Can I ask a clarifying question of Mr. Wetlaufer.

W. D. WETLAUFER: Yes, sir.

GENE VECCHIA: Are you saying that you are

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recommending wild and scenic designation, or wilderness designation, I didn't quite get the idea behind your talk.

W.D. WETLAUFER: Both.

GENE VECCHIA: Both?

W.D. WETLAUFER: Yes, sir.

JOHN SINGLAUB: John Baldus.

JOHN BALDUS: My name is John Baldus, I live at 630 North First Street in Montrose. I am the President of the Uncompahgre Valley Association, which is a Montrose based consumer and conservation group, and Vice President of the Western Colorado Congress, which is a similar group spread across the Western Slope. I'm representing the opinions of a large number of our membership.

We have several concerns about the RMP. One of our major concerns is the increase in the amount of coal leasing, almost a four-fold increase appears to us to be encouraging speculation in the coal leasing industry, but not enhancing development of the coal industry itself or coal production. We feel that this might very well be detrimental to the other resources of concern in the area.

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We are also concerned about the allowing of coal leasing, oil and gas leasing, locatible minerals leasing, mineral materials leasing in the proposed resource research natural areas, and the areas of critical environmental concern. There's no reason to allow leasing in these areas,

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it would only be detrimental to the resource that supposedly is being protected by designation of RNA and ACECs.

Another concern is livestock grazing in these ACECs and RNAs. Livestock grazing also should be very carefully looked at in areas of winter range for deer and elk, partly because it produces an adverse effect on the very people who use those grazing areas when these wildlife are forced into the private land to find forage in the winter. The Division of Wildlife pays out a fairly large amount every year in damages to crops that are partially a result of improper management of grazing allotments.

Concerning the ski area proposal and Storm King Peak, we rather resent the fact that the ski area was proposed as part of a conservation alternative. This is not conservation. We would very strongly recommend that the BLM consider the other resources in balance with the demand for recreation and the unlikelihood of actual development of the ski area.

We also would like the BLM to be very careful in considering its land tenure adjustments. The land tracts proposed for disposal often times are important habitats for both game and non-game species of wildlife, as well as plant life, and we need more looks at the situation from the wildlife biologists within the agency, and at the same time we would like to recommend that the budget for a wildlife

biology staff be increased rather than decreased as it has been in recent history.

Concerning the environmental impact statement that is included, or considered as part of this document, we find that the EIS, so called, is vague and incomplete to the point of being useless.

I might give you just a couple of most glaring examples, which are on page 50 of chapter 4, where impact on riparian zones from mineral resources management, it states that road construction, facility development, dredging operations, and other surface-disturbing activities in riparian zones would remove riparian vegetation, compact the soil, and could redirect subsurface water. There is no quantification whatsoever of the results of this development, and it mentions only these activities within the riparian zones, which these activities should not be occurring in the riparian zones in the first place. We assume that they would be occurring outside the riparian zones, and the impact in the riparian zones need to be quantified.

Once again, on page 51, chapter 4, impacts from livestock grazing management. Some localized disturbance and destruction of individual threatened and endangered plants would occur due to livestock trampling. Some disturbance. This is hardly sufficient for the public to judge, or for any other agency to judge whether these things

are harmful or should be recommended.

Page 52, chaptar 4, habitat, impacts from disposal of public lands. Habitat suitable for and used by whooping cranes and greater sandhill cranes would be lost if disposal of public lands around the Fruitgrowers, Crawford and Gould Reservoirs occurs. This is a very serious concern. These are endangered species and by Federal law should be protected to the maximum possible that the agency can manage. And to dispose of these when they are clearly habitats for threatened or endangered species seems very foolish.

JOHN SINGLAUB: Five minutes.

JOHN HALDUS: Okay. I'll continue my remarks with written statements.

Thank you.

JOHN SINGLAUB: Thank you.

JOHN RIEL: One question that I would have, John. You made the statement that the BLM should be careful in their land tenure adjustments, that it could be detrimental to wildlife, are you thinking of any particular areas when you make that remark?

JOHN HALDUS: Well, particularly the most important example, I think, is the tract around the reservoirs that I just mentioned; the Crawford Reservoir, the Gould Reservoir. If that is whooping crane habitat, then the wildlife biologists should never have allowed you to

consider even disposal of those tracts.

JOHN RIEL: Thank you.

JOHN SINGLAUB: Dave Seymour.

DAVE SEYMOUR: I'm Dave Seymour, I represent the Uncompahgre Livestock Association, my address is 8267 5700, Olathe.

As I sit here this evening, and of course I see quite a few of my neighbors and acquaintances in the audience here, do business with a lot of them. But I go back and I think that this process of evaluation of environmental resources, and resource development didn't exactly start in this century, but it got a real big boost back in the 30's when they put in the Taylor Grazing Act. And I think everybody here that has a ranch can remember back that far realizes that we have come an awful long way since we put in the Taylor Grazing Act.

I think this evening as we sit and look at this we ought to realize that we have come a long ways and an awful lot of the things we have here to discuss; whether it be wildlife, whether it be resources, whether it be increased water usage, a lot of these things have come because we, as mankind, have developed them. The wildlife that you see out here and take for granted, that you see in all these wilderness areas don't just haonen there, they have been propogated and they have been enhanced through

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mankind's use.

And I believe that as we sit here this evening and look at this thing that we can go down the road and continue to enhance these values, continue to enchance wildlife, continue to enhance grazing and to continue to enhance their values if we work together and if we keep in step with each other.

I believe as a respresentative of the Uncompahgre Livestock Association that we are in favor of the status quo of the management as it is, and I'd like to take comment from Tom Gore and Mrs. Gore, too.

There should be an awful lot tighter control on off-road vehicle use. I believe that anybody that's been out in the wilderness and been out in the public lands, wilderness areas included, realizes that there's a great deal of use from off-road vehicles, and any person that's a permitee, or any person that uses that land realizes that.

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And I think one point that should be made, one point that we, as BLM and as a public should get a hold of, is off-road vehicle use and we ought to increase the quality of the visitation to these lands.

I had an opportunity today to talk to a gentlemen who is directly -- well, he borders, his property borders two wilderness areas in the Upper Gunnison Basin, and he says some of the most destructive visitors that they will get

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on those wilderness areas, which is part of his grazing permit, are people that come in just to look at the scenery, to walk around to have a visual experience, maybe to camp, but they are some of the most destructive, they leave more trash and more visible disturbance than anybody that they can put out there.

So I guess as a respresentative of the Uncompahgre Livestock Association and Cattlemen's Association, we would like to encourage that there be at least no reduced grazing, that there be grazing as a status quo, and we believe as professional organizations that grazing enhances the values that are already there and enhances wildlife. And we believe that by working together with the public that we can enhance values that are already present, and increase those values that are already there.

Thank you.

JOHN SINGLAUB: Thank you.

Yvonne, has anyone else signed in to speak?

YVONNE SMITH: No.

JOHN SINGLAUB: We will go back to the beginning and give an opportunity to those who deferred to the end.

Deborah Gore.

DEBORAH GORE: My name is Deborah Gore, I reside in Olathe, Colorado, and I am a cormitee.

I hadn't prepared a written statement to read

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tonight at all. I planned to give a detailed statement later in the mail, but I think a few issues need to be brought up tonight pertaining to what I've heard here from the other concerned citizens.

My husband and I are of the third generation who have used in the area of Camel Back and Roubideau Creek grazing. And I'd likenˊ it to anyone who looks back at their childhood home, there is no place that you would rather protect and rather see continued in the way you have always known it.

I'm nervous.

Anyway, it is my childhood home, the Roubideau Canyon and Camel Back area, the Ben Lowe place. And we have known of it from the beginning of time, and I don't want to see it change.

But, here again, I do not think it is wilderness, has wilderness suitability. It has a quality to it that I love, but partly because I grew up with it. It has beauty, it has geology features that are very attractive. But it also has severities. It has extreme runoff in the spring, flash flood danger. He has miserable, hot, summer days with gnats. And it can have freezing hail storms in the middle of June. But this country right now, and as it always has been, is used for grazing. And in the books it states a reduction of 35 percent in riparian zones, and it is talking

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of a 200 AUM cut in this very area. And in our position as ranches we can't tolerate that. We don't feel that the 35 percent has any substantial documentation that would prove that it would help, and we feel that the 200 AUMs is ridiculous. Any of you who have walked the Creek, walked the Camel Back area, the Windy Mesa area, I'm sure you have noticed that there is feed out there and there is feed for your deer and your wintering elk and the cattle.

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And what you see out there is not what just happened, like Dave Seymour said, is not just what happened right now, it's what has happened since the beginning of cattle grazing out there.

And I feel that grazing can enhance it.

And that's basically my position on what's been said tonight, is that it isn't suitable for wilderness, but since it hasn't changed in several hundred years, I don't think it's going to in the near future. And I'd like to see it stay the way it is and managed in the current management. And any rest of my comments will be in the mail.

JOHN SINGLAUB: Great. Thank you.

Richard Gore.

RICHARD GORE: My name is Richard Gore from Olathe, Colorado, and I'm the third generation in here ranching. And, in fact, I've spent all my life in Roubideau

Canyon and the Roubideau area and right on up there to our forest permit is how we operate our cattle. And it's just the backbone of how we get there and get to our forest. And I'm really upset about the 35 percent limited use on the riparian, and the 200 AUMs, that would just mean the drift over of our cattle to get to our summer grazing where we spend four and a half months. And we are not really there that much on the BLM, probably about two months at the most. And it would really hurt us.

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Then cattle generate a lot of income and stuff for the towns of Delta and Montrose. And things got tough, why, Delta pretty much went under because of the farmers and stuff couldn't make it and lots and lots of my neighbors went under, and I happen to be one that's hanging on. And I'm just not in favor of that, or that wilderness program.

Right now everybody can come and go on the Federal land like they want. There's nothing stopping them from using them right now, and the cattlemen and sheepmen aren't there to rape the land, they are there to work with the BLM and improve things. And I enjoy and look forward to working with the BLM, getting ponds on these dry mesas and stuff to help the wildlife and cattle and sheep.

And just by working together we can whip this thing, but just one use just don't work, because I've been to several of these demonstration allotments lately and it

proved that everything can work in together.

And I'm definitely not in favor of dumping these wild sheep in the riparian zone when they are already calling them overused, and the water values and stuff, I think it would just be detrimental.

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Then basically that's what I have to say, and I think we can work together and whip this thing.

JOHN SINGLAUB: Thank you.

W. A. Hamilton.

W. A. HAMILTON: My name is really Bill Hamilton, 573 Highway 65, Cedaredge. I've lived right in this locality for over 70 years, been a stockman most of my life, and I'd like to say that the stockman enjoys the wildlife, the birds and the trees about as much as anyone I know of. And I believe they're just as good an environmentalist as anyone in the country.

As a boy growing up I enjoyed the wildlife. I was nearly 12 years old before I saw a deer right in this country. And they was very few for many, many years. It didn't have a season for years.

They then, through protection of the deer, they grew very rapidly and in the 1950's you could get a license and kill about as many deer as you wanted, two, three does and a buck.

I can remember as a boy riding in on the BLM and

Forest, I don't believe there was a bit more feed in those days than there is right out there today.

I see quite a lot of -- we have a permit on the Uncompahgre and I see quite a lot of deer up there in the summer, but I don't see near as many nice, big bucks as I do down here on the river on the private ground. So I think that -- I think most of that land people will let you hunt, or maybe they feed in the winter more than they do in the summer, but that's where the big bucks are, most of them are on the private ground.

I think that through working together that most of all these things can be worked out. I know that there is many places that I'd much rather lay down and take a drink out of the stream where there has been wildlife and cattle and sheep than I would where there has been too many people walking around and spending a day or two.

I think that's about all I have to say. Thank you.

JOHN SINGLAUB: Thank you.

Hank Davis.

HANK DAVIS: I'll make a written statement.

JOHN SINGLAUB: Eleanor Walrod.

ELEANOR WALROD: I'm waiting for the questions and answer period.

JOHN SINGLAUB: Okay. Is there anyone that did

not sign up who would like to speak this evening?

HERSCHEL BUD BURGESS: I was late getting here, I would just like to make a few comments on just what was said tonight.

JOHN SINGLAUB: Would you come up here and state your name and address and who you represent, if anyone, and I'll ask you to sign this when you finish.

HERSCHEL BUD BURGESS: All right. I'm known to most as Bud Burgess. My address is 2380 N Road, Eckert, Colorado.

I've listened with interest to a lot of the statements made here tonight, and there's a lot of concern with this public land.

One of my questions is why is this land what it is today. Who developed it. And I think you will go back and listen to what some of these livestock people have said, a lot of the land was developed by the livestock people. They're what made it what it is today.

Most of the damage that has come is from the people, your four-wheel vehicles, and we've got these three-wheel vehicles and now we've got these little four-wheelers and two-wheel bikes. There's where your damage is coming from. I can take you places on the Forest and the BLM and show you where we get a lot of the damage from these little vehicles today.

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The gentleman from Texas alluded to the quality of the Gunnison. How many of you remember when you could walk down the Black Canyon and couldn't see the water between the waterholes. How many of you people were in this area at that time.

What has made the Gunnison River what it is is the development on the Gunnison River.

Wildlife and livestock, as Mr. Hamilton alluded to is very compatible. A lot of old timers around the turn of the century will tell you about how few the deer were in this country.

And look at the problems we have got today. Why are those problems here today. A lot of my reasoning of why these problems are here today are because of mismanagement of the deer. These deer are harassed from the first of August until the middle of January. Down in these river-bottoms it was a rare occasion to see a deer 20 years ago. Now we have a lot of resident deer.

So if the people really want to look at the facts of what they want is water management, wildlife management, look at where the real problem is, not try to lay the blame on something that is not the problem, which a lot of times is not.

Thank you.

JOHN SINGLAUB: Thank you.

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Do we have other speakers?

Do we have another speaker?

BILL HARRISON: John, could I add something to something I already said?

JOHN SINGLAUB: Just a minute after I give an opportunity to those people that I cut off.

Mr. Rule, would you like to add anything to what you said?

W. W. RULE: No.

JOHN SINGLAUB: Mr. Baldus, would you like to add anything to what you said?

JOHN BALDUS: No, I don't want to keep you all here until midnight.

JOHN SINGLAUB: Mr. Harris?

BILL HARRIS: One thing that's been commented on a few times tonight that I would like to --

JOHN SINGLAUB: This isn't an opportunity for rebuttal.

BILL HARRIS: This is a continuation of my statement, something that I didn't touch upon in my statement.

There has been some comments made about off-road vehicles. It is my experience; and I think the experience of a lot of people that are involved with cultural resources
125 management that the use of off-road vehicles has a detrimental affect on cultural resources. Not only on the sites

M-9

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themselves, but also it provides an opportunity for vandals and people who like to go digging, and that sort of thing, to destroy sites, it provides them a means of getting some
125 place easily.

The soil is damaged by these vehicles to the point where erosion occurs. When the erosion occurs, sites are damaged in the extreme, in some instances.

So the Chipeta Chapter and the Archeological Society would be opposed to any continuing, or improvement or opening of off-road vehicle use, and they would definitely be in favor of closing down a lot of areas that receive that kind of use.

Thank you.

JOHN SINGLAUB: Thank you.

I believe that's everyone who wanted to speak this evening.

I realize the format of the hearing makes it sometimes awkward to get questions answered and to get the point across, and I urge you to take the opportunity at the end of the session now to visit with some of the people up here to get your questions answered, if you have some.

I appreciate the time that you have taken to come here this evening, I know I speak for everyone here in thanking you for your interest and concern in the public lands. And thanks for taking time out to come here this

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evening. The hearing is hereby adjourned.

(Hearing adjourned.)

United States Department of the Interior
BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

IN REPLY REFER TO UC-152

OCT 1 [illegible]

Memorandum

To: Mr. Robert E. Vecchia, RMP Team Leader, Bureau of Land Management, Uncompahgre Basin Resource Area, 2505 South Townsend Avenue, Montrose, Colorado 81401

From: Acting Regional Director
Bureau of Reclamation

Subject: Review of Bureau of Land Management Draft Environmental Impact Statement for Uncompahgre Basin Resource Management Plan and Wilderness Technical Supplement (DES 87/20)

Our office has reviewed the subject documents and has prepared the attached comments.

Attachment

Comments on Uncompahgre Basin Resource Management Plan and EIS

General

Page 2-10: Recent unpublished studies associated with the Uncompahgre Hydropower Project indicate that the range and population of the endangered plant Eriogonum pelinophilum, may be greater than indicated in Table 2-6. When these studies are published we will furnish the information to the Bureau Land Management (BLM).

97 Page 2-14: In Table 2-11 it is not clear what area "Gunnison River No. 3" refers to. The same comment applies to the terms "Smith Fork Gunnison River No.1 and No. 2" and "Uncompahgre River No. 4".

91 Page 2-21: Withdrawals: The management of the power site withdrawals is currently handled by BLM on Crystal and Dominguez. The Crystal power site withdrawal should be turned over to the Bureau of Reclamation (Reclamation). The Dominguez power site withdrawal should be kept by BLM for future development as Reclamation is relinquishing its withdrawals on the Dominguez Project at this time. If there are any questions on withdrawals or rights-of-way, please contact Steve Schiesswohl or Bill Ellison in our Grand Junction Projects Office at FTS 322-9217.

88 Page 3-2: Off-Road Vehicle Designations: The off-road vehicle designation for all Reclamation lands (withdrawn or otherwise) is that the lands are closed to off-road use and off-road vehicles unless specifically opened. It would enhance management of Reclamation project withdrawals if they were so designated on BLM maps.

Management Alternatives

Continuation of Current Management Alternatives (Alternative "A")

128 Page 3-3: Livestock Grazing: Grazing permits that involve withdrawn lands should be reviewed and in most cases adjusted to restrict grazing on developed Reclamation facilities and recreation areas. This should be handled on a case by case basis.

Map "A":

93 Considerations below are listed separately by Reclamation project name. Any proposed disposal of lands that are withdrawn by Reclamation and Reclamation intends to retain under the Withdrawal Review program, should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to Reclamation, absolute Fee title would be required to protect project features from mining activities. Most comments have been accompanied by the proper legal description. In some cases, however, we have not included a description because of the length. Descriptions for all Reclamation lands are available from Reclamation Withdrawal Review reports or from Reclamation's

Grand Junction Projects Office.

A1. The Reclamation withdrawals between the Black Canyon and Curecanti area in Sections 4, 9, 10, 11, 14, and 23, T49N, R7W, are not properly marked on the map. These lands were withdrawn for the Uncompahgre Project and the Aspinell Storage Unit of the Colorado River Storage Project (CRSP). The withdrawal in Sections 10, 11, 14, and 23 are for the CRSP and the withdrawals in Sections 4 and 9 are for the Uncompahgre Project.

A2. The Reclamation withdrawal on Fruitgrowers Reservoir should be shown to include the water surface. This withdrawal is not subject to relinquishment. Reclamation also has title to the reservoir easement at Fruitgrowers Reservoir.

A3. The 40 acres in the NW4SW4 of Section 34, T46N, R8W should also be shown as withdrawn for the Dallas Creek Project.

A4. On the Paonia Project, lands are withdrawn in the SE4NW4NE4 of Section 18, T13S, R90W, but are not shown as withdrawn. In the S2NE4SE4 and the NE4NE4SE4 of Section 13, T14S, R93W, the withdrawal is not plotted correctly. The tracts identified for disposal in T14S, R93W, Section 22; and T14S, R92W, Sections 3 and 17, are not subject to relinquishment and disposal is not compatible with project purposes.

89 The SW4SW4 of Section 3, T14S, R92W, is questionable as to being public land. Reclamation acquired an easement from the private owner (Overman, H.E.) in about 1950, and if the land is in fact private, the RMP maps need to be changed. If the land is public, Reclamation will be requesting a linear withdrawal to match the dimensions of our existing easement. A withdrawal would be consistent with our other land status agreements with the BLM on the Fire Mountain Canal.

A5. As both the Dominguez and Fruitland Mesa Projects are being proposed for relinquishment in their entirety, we did not review the plotting or disposal recommendations for parcels withdrawn for these projects.

A6. The withdrawals for the Uncompahgre Project need to be corrected on the map as follows:

The following parcels should be shown as withdrawn:

The NE4NE4SE4 of Section 13, in T15S, R95W, (It may be shown this way, but the map scale makes it hard to see); the 5 acre tract of the SW4SW4NW4SE4, the SE4SE4NE4SW4, the NE4NE4SE4SW4, and the NW4NW4SW4SE4 of Section 36, T15S, R95W; the 10 acre tract of the SW4NE4NW4 of Section 30, T51N, R9W; the 15 acres of the E2W2E2NE4SW4 and the E2E2NE4SW4 of Section 36 of T50N, R11W. Also, the lands next to the inside the Black Canyon National Monument need to be added as mentioned in item A1 above.

Certain withdrawals on the South, West, Montrose and Delta canals were inadvertently relinquished without Reclamation retaining a linear withdrawal for project facilities. Measures to correct this problem are being worked on

87 at this time. In the interim, any land disposals should retain a linear withdrawal for all structures, canals, diversion dams, large laterals such as

87 the CQ lateral on the Montrose and Delta system, or other major facilities, and right-of-way for all laterals.

PRODUCTION ALTERNATIVE
(ALTERNATIVE "B")

All recommendations made under the Withdrawal Review are to remain the same with the exception of approximately 130 acres at the far west end of the Paonia State Recreation Area which Reclamation is in the process of proposing for relinquishment.

The Dominguez and Fruitland Mesa withdrawal reviews are proposed to be completed this fiscal year.

50 Visual resource objectives for all Reclamation recreation areas including the entire proposed Curecanti National Recreation Area, the Ridgway, Crawford and Paonia State Recreation Areas; and the Fruitgrowers area should all be high scenic quality and high sensitivity. The proposed Curecanti National Recreation Area, Paonia, and Fruitgrowers areas should be added to Table 2-16.

90 The withdrawals section on page 2-21 indicates that Reclamation withdrawals segregate the lands from the general mining laws. It was the intent and practice of all Reclamation withdrawals to segregate the lands from all of the public entry laws. Under the FLPMA Withdrawal Review program, Reclamation is relinquishing all but the bare necessity of its withdrawn lands, and those lands being retained will be managed with the intent to restrict all surface occupancies that are contrary to Reclamation project purposes.

92 The withdrawal table on page 2-22 should be changed to include all Reclamation purposes such as recreation, flood control, soil and moisture conservation, or state only "Reclamation purposes". As it now reads it may be construed to mean the listed purposes are the only Reclamation purposes and this is not true.

Map "B"

93 Considerations below are listed separately by Reclamation Project name. Any proposed disposal of lands that are withdrawn by Reclamation and that Reclamation intends to retain under the Withdrawal Review program, should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to Reclamation, absolute Fee title would be required to protect project features from mining activities.

89 B1. The Reclamation withdrawals between the Black Canyon and Curecanti areas in Section 4, 9, 10, 11, 14, and 23, T49N, R7W, are not properly marked on the map. These lands were withdrawn for the Uncompahgre Project and the Aspinell Storage Unit of the CRSP. The withdrawal in Sections 10, 11, 14, and 23 are for the CRSP and the withdrawals in Sections 4 and 9 are for the Uncompahgre Project. The portion of Section 8 that is proposed for disposal is planned for relinquishment and is therefore approved for disposal.

82. Comments same as A2.

89 83. The 40 acres in the NW¼SW¼ of Section 34, T16N, R8W should also be shown as withdrawn for the Dallas Creek Project.

85 Lands shown for disposal in T4N, R4W in Ouray County north of Cow Creek are important big game winter range and should not be disposed of unless to the Colorado Division of Wildlife. These lands are in the vicinity of lands acquired for wildlife habitat replacement under the Dallas Creek Project.

87 84. Comments same as A4. Also, the disposal recommendations for the following parcels are not compatible with Project purposes unless a linear withdrawal is first granted: T14S, R92W, Section 3, NE¼SE¼; T14S, R92W, Section 17, S½SW¼NW¼; and T14S, R93W, Section 22, about 33 acres.

89 85. Comments same as A5.

85 86. Comments same as A6. In addition, the recommendations for disposal on the following tracts should be changed to retention:
The SE¼NW¼ of Section 26, T49N, R8W; the NW¼SW¼ of Section 11, T48N, R10W; the two tracts in Section 12, T48N, R8W; and the apparent disposal (the lands to the east are actually merged) of Section 36, T50N, R11W.

CONSERVATION ALTERNATIVE

MAP "C"

93 Considerations below are listed separately by Reclamation Project name. Any proposed disposal of lands that are withdrawn and that Reclamation intends to retain under the Withdrawal Review program, should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to Reclamation, absolute Fee title would be required to protect project features from mining activities.

C1. Comments same as A1.

C2. Comments same as A2.

89 C3. The 40 acres in the NW¼SW¼ of Section 34, T16N, R8W should also be shown as withdrawn for the Dallas Creek Project.

C4. Comments same as A4.

C5. Comments same as A5.

C6. Comments same as A6.

PREFERRED ALTERNATIVE

Map "D":

93 Considerations below are listed separately by Reclamation Project name. Any proposed disposal of lands that are withdrawn and that Reclamation intends to retain under the Withdrawal Review program, should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to Reclamation, absolute Fee title would be required to protect project features from mining activities.

D1. Comments same as A1

89 D2. Comments same as A2.

D3. Comments same as B3.

87 D4. Comments same as B4.

89 D5. Comments same as A5.

85 D6. Comments same as B6.

Comments on Uncompahgre Basin
Wilderness Technical Supplement

Designation of the Gunnison Gorge Wilderness Study Area as Wilderness could affect certain management practices and these effects should be discussed in the final EIS.

49 First, helicopters, small airplanes, and outboard motors are used as inventory tools by the Colorado Division of Wildlife for managing the Gunnison River fishery and waterfowl populations. Secondly, rescue operations are occasionally conducted in the canyon by helicopter.

On page 3-13, the minimum flow that Reclamation attempts to maintain is
71 300 cfs rather than 200 cfs.

On page 4-13 it is stated that there is approximately 750,000 acre-feet of water available from Blue Mesa Reservoir. The correct figure is 50,000-60,000 acre-feet annually.

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
WSR-Mail Stop 423
DES 87/20

OCT 19 1987

Memorandum

To: Bureau of Land Management, Uncompahgre Basin Resource Area, Montrose, Colorado

From: Assistant Director for Engineering Geology

Subject: Review of draft management plan/environmental statement for the Uncompahgre Basin planning area, Colorado

We have reviewed the statement as requested in the letter included in the document.

39 The analysis should indicate criteria to be used in permitting mining and disposal of mineral materials on alluvial valley floors and flood plains. Mitigation of related impacts should be addressed. The analyses of cumulative impacts should include long-term effects of aquifer mining and accidental release of saline formation waters into freshwater aquifers.
38 Such contamination may occur long after oil and gas test and production wells are abandoned as well as during operations such as hydraulic fracturing, injection of formation waters, and enhanced recovery. Ground-water impacts to be avoided during secondary and/or enhanced recovery methods involving injection and well pressuring should be included in the analysis.

/s/ James F. Devine

Copy to: District Chief, WRD, Lakewood, Colorado

United States Department of the Interior

BUREAU OF MINES

P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Intermountain Field Operations Center

October 21, 1987

Memorandum

To: Robert E. Vecchia, RMP Team Leader, Bureau of Land Management, Uncompahgre Basin Resource Area, 2505 South Townsend Avenue, Montrose, Colorado 81401

From: Chief, Intermountain Field Operations Center

Subject: Review of the Draft Resource Management Plan/Environmental Impact Statement for the Uncompahgre Basin Resource Area, Delta, Gunnison, Mesa, Montrose, and Ouray Counties, Colorado

As requested, Bureau of Mines personnel have reviewed the subject documents regarding proposed management of 463,077 acres of Federal land and 735,923 acres of subsurface federal mineral estate, including three wilderness study areas (WSA's) (41,865 acres), in western Colorado. Our comments pertain to the discussion of mineral resources and assessment of impacts under the plan.

Four multiple-use management alternatives are presented in the DEIS. Differences between the four proposals vary considerably in the amount of acreage open to mineral entry and to oil and gas, coal, and geothermal leasing. From a mineral-development standpoint, the Production Alternative is the more favorable of the plans described. In comparison to the Preferred Alternative, it makes about 30,000 more acres available to mineral entry and about 196,000 more to oil and gas and geothermal leasing; the acreage open to coal leasing is the same under both alternatives.

35 In the "Affected Environment" section, the discussion of oil, gas, and geothermal resources (p. 2-3 of the main document) assumes that the lack of past or present production of these commodities implies a low probability for future discoveries. We believe that such an assumption may not be valid because seismic work and exploration drilling have been limited in the resource area. We suggest the Affected Environment Section of subsequent versions of the document be modified to better explain the relationship between the assumption of low productivity of future discoveries and the lack of exploration activity in the area.

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71 The geology and mineral resource descriptions in the Wilderness Technical Supplement tend to discuss only the surface geology of the WSA's. We believe that formations at depth should be discussed as well. For example, the Adobe Badlands WSA is underlain by the Morrison and Chinle Formations, both of which are major hosts for uranium deposits in other areas. Uranium, however, is not discussed in the Mineral Resources section (p. 3-10). We believe that the lack of a discussion of the uranium potential in the Morrison and Chinle Formations is an oversight that should be corrected in future versions of the document.

The Bureau of Mines currently is conducting a mineral land assessment study of Gunnison Gorge WSA, but has no current study of either Adobe Badlands WSA or Camel Back WSA.

Thank you for the opportunity to comment on this document.

Bradford B Williams
For William Cochran

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United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
12795 W. Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

IN REPLY REFER TO:

L7619 (RMR-PP)

OCT 29 1987

Memorandum

To: Robert E. Vecchia, Resource Management Plan Team Leader, Bureau of Land Management, Montrose, Colorado

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft Uncompahgre Basin Resource Management Plan/ Environmental Impact Statement and Draft Uncompahgre Basin Planning Area Wilderness Technical Supplement (DES 87/20)

Our comments on the subject draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) follow. Review of the document was made relatively easy due to several factors:

1. The draft RMP/EIS is very well written.

2. The number of alternatives (four) and the orderly presentation of material made it convenient to compare impacts of alternatives.

3. The three alternatives other than the proposed plan are analyzed as thoroughly as the Preferred Alternative.

We recognize the Bureau of Land Management's (BLM) multiple-use approach to land management, but we would like to see more concern for National Park Service (NPS) interests in specific portions of the Preferred Alternative.

68 1. The Preferred Alternative appears to reflect a concern for wilderness values--both on BLM-administered lands and on lands administered by the NPS. We note that the Gunnison Gorge Wilderness Study Area (WSA) would be recommended for designation as wilderness; the Adobe Badlands WSA would not be recommended for designation, but there would be restrictions on surface-disturbing activities and no Off-Road Vehicle use there. However, we believe that the Adobe Badlands WSA is deserving of wilderness status and should not be rejected for designation because of plans to implement salinity control measures. Efforts to reduce salinity should be concentrated in the agricultural areas where increased salt loading is caused by agricultural practices.

17 2. Some BLM-administered lands near the northeast and northwest boundaries of Black Canyon of the Gunnison National Monument are designated as potential exchange tracts under the Preferred Alternative. As the draft RMP/EIS is

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2

17 revised, we would like to see these lands either deleted as potential exchange tracts or have provision for scenic easement language that would ride with the dead(s) conveying the exchange tracts. These BLM-administered lands form an important backdrop to the viewshade looking north from the monument's south rim.

16 3. The four land status maps included with the draft RMP/EIS, after page 43 of the Appendix, need to be revised to show correct NPS boundaries. The maps show the Black Canyon of the Gunnison National Monument boundaries as they existed years ago; the monument boundaries have since expanded. The maps fail to show the considerable portion of Curecanti National Recreation Area that occurs in the Uncompahgre Basin Planning Area. As a good reference for correcting the maps, we recommend the BLM Edition (1985) of the Paonia Quadrangle topographic map.

Thank you for the opportunity to review the generally well-prepared draft RMP/EIS.

Richard A. Strait

5

United States Department of Agriculture | Forest Service | Grand Mesa, Uncompahgre and Gunnison National Forest Phone: (303) 874-7691 | 2250 Highway 50 Delta, Colorado 81416

Reply to: 1950

Date: NOV - 2 1987

Mr. Robert E. Vecchia, RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

We have reviewed the draft Resource Management Plan for the Uncompahgre Basin Resource Area. As you can see from the comments of the District Rangers which follow, we are unsure of where the fire management strategies are to be applied. Consequently, we are unable to determine if they would be compatible with fire management efforts on adjacent National Forest System lands. We recommend that some additional coordination be done in this respect.

Paonia Ranger District

In reviewing the above referenced plan, we found the proposed management units compatible with ours, both in terms of location and management emphasis/direction. The only concern we surfaced dealt with the application of the three proposed wildfire suppression strategies. From the information available for review, it was not possible to determine the geographical locations at which the various strategies would be applied and whether or not they were compatible with fire management efforts on adjacent FS lands. I suggest we review the proposed fire management with the BLM at the Forest level just to be sure we do not have any significant inconsistencies.

108

Ouray Ranger District

BLM's management areas D1, D2 and D3 are adjacent to our management prescriptions 4B and 5A on the Uncompahgre Plateau. Management emphasis and direction are compatible.

None of the access acquisition proposals on the Plateau would have an effect on NF lands. Closing Potter Creek will have no effect. Dry Fork Escalante Road will not be closed according to Gene Vecchia. BLM's D9 management areas and emphasis are compatible with our 9A prescriptions although our map doesn't have them identified.

BLM's D10 Management area in the Cimarron Ridge country is adjacent to 2A, 4B, 5B and 6B. These appear to be compatible also. The access to High Park would improve access to the NF. Storm King Ski Area would not have an effect on NF as it would be located in the northernmost unit.

15 The D15 management area adjacent to NF on High Mesa would be open to ORV's. This is adjacent to a restricted travel area on N.F.

The location of the BLM's proposed three fire management strategies also need to be identified on this end of the Forest.

Other than the fire management item, we have not identified any significant additional concerns. We appreciate the opportunity for this review.

Sincerely,

For: RAYMOND J. EVANS
Forest Supervisor

cc: Regional Forester
Chief (Director, Environmental Coordination)

FS-6200-26(7-82)

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242

RECEIVED MONTROSE OCT 19 1987 BLM COLO.

Mr. Robert S. Schmidt
Montrose District Manager
Bureau of Land Management
Montrose District Office
2465 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Schmidt

This is in response to your request for comments on the Draft Planning Area Wilderness Technical Supplement for the Uncompahgre Basin Planning Area located in southwest Colorado.

We continue to support the overall wilderness area concept. While actual conflicts between Air Force flying areas/routes and the proposed wilderness area do not exist at the present time, routes and airspace requirements of the military do change frequently. Mission requirements, fuel costs, and environmental constraints all act on the decision to locate a military training activity. In particular, low altitude high speed flight, because of general aviation and population pressures, has been relegated to those areas least accessible and sparsely inhabited. For
57 this reason, it is requested that you give full consideration to the extent to which a wilderness designation might adversely effect or restrict use of low altitude airspace by the Air Force. If restrictions are placed upon these military overflights, the negative impact on training and readiness will force the Air Force to object to that wilderness designation.

We hope this information is useful in your planning process. We thank you for the documentation previously provided and look forward to continued communication with your office. Our staff project officer is Mr. Raymond Bruntmyer, telephone (214) 653-3341.

Sincerely

JOHN A. MILLER, Lt Colonel, USAF
Director
Environmental Planning Division

Copy to:
HQ USAF/LEEV

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
529 25½ Road, Suite B-113
Grand Junction, Colorado 81505

IN REPLY REFER TO:
(FWE)
MEMORANDUM

November 5, 1987

To: RMP Team Leader, Bureau of Land Management
Uncompahgre Basin Resources Area, Montrose, Colorado

From: Acting State Supervisor, Fish and Wildlife Enhancement
Fish and Wildlife Service, Grand Junction, Colorado

Subject: Draft Uncompahgre Basin Resources Management Plan/Environmental Impact Statements and the Draft Uncompahgre Basin Planning Area Wilderness Technical Supplement

General Comments

We have reviewed the referenced Resources Management Plan/Environmental Impact Statement and related Wilderness Technical Supplement. The Endangered Species Act (Act) requires that an action agency consider possible impacts to proposed and listed species and their critical habitats to determine if any proposed plan may effect such species or habitat areas. Should the Bureau of Land Management make a "may affect" determination, then formal consultation should be initiated. Management proposals identified in the plan seem, at this time, too general to make a "may/may not affect" determination for any species with certainty. It is our suggestion that informal consultation continue as specific actions are planned for the resources area rather than trying to make a blanket determination for the broad Resources Management Plan. By consulting on a case-by-case basis, we will know exactly what action is being considered and will have the advantage of the latest biological knowledge for the species involved, as well as important habitats such as wetlands and riparian zones.

Specific Comments

Page 2-10, Table 2-6. Endangered, threatened, candidate, or sensitive plant species.

11 The habitat descriptions for the spineless hedgehog cactus and Uinta Basin hookless cactus are reversed. Based on new locations discovered by Jim Ferguson last field season the habitat description for the Delta lomatium should be expanded to include mid-altitude mancos shale in association with pinyon-juniper. The Wetherill milkvetch (Astragalus

11 wetherillii), a plant on State List 3 and which will be added as a federal candidate in the next update, should be added to Table 2-6. Its habitat is clay hills in association with pinyon-juniper and sagebrush. Estimated populations include four collections from the Uncompahgre Resources Area, and the estimated acerage of occurance is unknown.

Page 2-12, Table 2-8. Endangered, threatened, and candidate animal species.

The river otter, Lutra candensis sonorae, is a federal candidate species.

85 Page 3-30. Disposal of public lands.

We recommend that public wildlife values be considered prior to any disposal of public lands.

Page 3-31, 37. Oil and gas.

The Service would appreciate involvement in any variance to seasonal stipulations on lands used by bald eagles for hunting habitat.

Page 4-50. Impacts on riparian zones.

The Service would appreciate involvement prior to the approval of any disturbances to riparian zones.

99 Page 4-51. Impacts on threatened and endangered species.

The Service would appreciate involvement prior to any mineral resources management that might affect wintering bald eagles. Appropriate consultation may be necessary if offroad recreational vehicles use affect the Uinta Basin hookless cactus or if the disposal of public lands affects any threatened or endangered species.

P4-52. Impacts on terrestrial wildlife.

The Service would appreciate notification of the potential loss of any raptor nesting habitat.

Thank you for the opportunity to provide our comments prior to completion of the draft. Again, we would appreciate the opportunity to comment when specific actions are completed.

Robert P. Kruger

cc: AME-Denver
FME-SLC
Reading File
Official File

DGober:dm:11-5-87 (blmuncom Fuser 5)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET–SUITE 500
DENVER, COLORADO 80202-2405

NOV 05 1987

Ref: 8PM-EP

Robert E. Vecchia, BMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

RE: Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement (RMP/EIS), and Wilderness Technical Supplement

Dear Mr. Vecchia:

In accordance with the National Environmental Policy Act (NEPA) and our responsibilities under Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the referenced documents. The EPA appreciated the opportunity to meet with you and other BLM staff at Montrose in March, 1985. The meeting was followed up by EPA's scoping concerns for the project which were sent on May 3, 1985. In addition to environmental conditions and effects, our review is also focused on the RMP as a "framework for managing and allocating public land resources" and it's importance in establishing "management direction" (page 1-1). Our enclosed detailed comments are intended to make a constructive contribution to the management direction.

Based on our concerns and the criteria EPA has established to rate adequacy of draft EIS's, we have rated this draft EIS as category EO-2 (environmental concerns - insufficient information). A summary of our EIS ratings definitions is enclosed. We commend the inclusion of management units; initiatives on aquatic and riparian zoning; and the emphasis on salinity, riparian, and aquatic systems. However, our enclosed comments address insufficiencies and recommendations that we feel are appropriate at the RMP level of planning, regarding:

- the description of consistency with water quality standards (existing/designated beneficial uses, use protection criteria and antidegradation requirements) and the Federal/State water quality management programs,
- the framework of measures, criteria, and indices that would be used, e.g., physical measures (such as channel and streambank stability), chemical criteria, and biological indices, for implementing water quality standards (WQS)/aquatic resource protection under the Clean Water Act (CWA) and Federal Land Policy and Management Act,

- consistency of analysis of effects on aquatic resources/beneficial uses in relation to applicable statutes,
- a framework for CWA/WQS monitoring,
- additional guidance and documentation for protection of riparian and wetland values,
- planning of range management to support multiple rangeland values under applicable statutes,
- need for consistent Areas of Critical Environmental Concern (ACEC) recommendations by alternative, and plans for ACECs that are adequate to assure resource protection,
- compliance with the Endangered Species Act,
- and inclusion of more specific plans for coordination and implementation, among other items, in an implementation chapter or appendix.

Several features of the Conservation Alternative are identified, that would also help provide a stronger, more aggressive resource management program.

A statewide antidegradation policy is an important part of State WQS. EPA's WQS regulation requires that, at a minimum, state policy ensure that existing instream uses and the level of water quality necessary to protect the existing uses be maintained and protected (40 CFR Part 131.12). This provision applies to all waters of the state. Furthermore, the state policy must establish additional measures for protection of certain high quality waters (waters where ambient quality exceeds that needed to protect the "fishable/swimmable" uses) and waters which may constitute outstanding national or state resource waters. At present, there is a difference in the way the federal and state regulations and guidance identify high quality waters. Under the current state regulation (5CCR 3.1.8 (3)), High Quality Class II waters ". . . shall be maintained and protected at their existing quality unless the Commission chooses, after full intergovernmental coordination and public participation, to allow lower water quality as a result of necessary and justifiable economic or social development". In Colorado, this level of protection is applied only to water designated by Colorado's Water Quality Control Commission (WQCC) as High Quality Class II waters. EPA's regulation would not distinguish between those waters designated High Quality Class II by the state and those that are, by definition, high quality. EPA has approved the current state antidegradation standard in the past. However, based on changes embodied in EPA's new water quality standards regulation, the WQCC has begun a review of the present standards and expects to complete the review process in mid 1988. We encourage the BLM to be part of this process and be aware of the applicability of any new requirements that may apply to BLM streams. The State of Colorado contact person is Dennis Anderson in Denver (331-4571) and the EPA contact is William Wuerthele (FTS 564-1586 or commercial 293-1586).

We would appreciate the opportunity to discuss with the BLM its proposed responses and RMP/EIS revisions relating to EPA concerns prior to the RMP/Final EIS. Based on experience reviewing these documents, such a coordination process would be beneficial in helping address our concerns. Please contact Douglas Lofstedt of my staff as needed for further EPA coordination at 303-293-1717 or FTS 564-1717.

Sincerely,

Robert R. DeSpain

Robert R. DeSpain, Chief
Environmental Services Branch
Policy and Management Division

Enclosures

cc: Neil F. Morck, Colorado BLM State Director
David Williams, Office of Planning and Environmental Coordination, BLM Washington Office
Jon Scharschligt, Colorado Department of Health
Nick Krueger, USDWS, Grand Junction
Laurie Mathews, Colorado Department of Natural Resources
William Dickerson, EPA Office of Federal Activities

EPA DETAILED COMMENTS ON THE BLM DRAFT
UNCOMPAHGRE BASIN RESOURCE MANAGEMENT PLAN AND
ENVIRONMENTAL IMPACT STATEMENT (RMP/EIS),
AND WILDERNESS TECHNICAL SUPPLEMENT

Aquatic Resources, Watershed Management

Our review of plans for water quality and aquatic resource integrity is based on consistency with:

- o Colorado's water quality standards (WQS) and water quality management program,
- o Executive Orders (EOs) 11752 and 12088 and Clean Water Act Section 313 requirements for Federal agency leadership to "protect and enhance the quality of . . . water . . . resources" (EO 11752) through meeting applicable standards,
- o requirements for RMP consistency with "officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State and local governments" in 43 CFR Part 1610.3-2;
- o Federal Land Policy and Management Act (FLPMA) policies to "protect the quality of ecological, environmental, . . . and . . . water resource . . . values" (Section 102(a)(8)), to meet applicable State and Federal "pollution control laws" and water pollution "standards or implementation plans" (Section 202(c)(8)), and "to prevent unnecessary or undue degradation of the lands" (Section 302(b)).
- o the Clean Water Act (CWA) objective to "achieve and maintain physical, chemical, and biological integrity of the nation's waters" (Section 101(a)),
- o and "NONPOINT SOURCE CONTROLS AND WATER QUALITY STANDARDS" guidance (August 19, 1987) from Chapter 2 of EPA's Water Quality Standards Handbook.

The draft RMP/EIS proposes impacts to aquatic resources from several activities.

1) Locatable mineral activities could "result in water quality degradation", "increase sediment and salinity loads in local surface waters", and "could result in heavy metal contamination from mine water discharge and spoil-pile runoff" (page 4-49).

2) Oil and gas activities "would increase sediment and salinity yields in local surface waters" (page 4-49).

3) "Road construction and extraction of mineral materials would increase sediment and salt loads in local surface waters", and could alter "natural stream channels" and "surface water flows" (page 4-49).

4) Forest management activities "could cause increased sedimentation, bank degradation, and water temperatures, and decreased streamback cover" (page 4-54).

5) ORV management would leave aquatic habitat areas "subject to degradation" (page 4-54).

The Preferred Alternative would also require "Measures designed to minimize erosion and water quality deterioration" and "minimize site-specific riparian and aquatic deterioration" would be in plans for surface disturbing activities (page 3-29).

73 In response to these potential effects and/or violations of WQS, we found that the RMP/EIS provides an insufficient framework of planning, management, and monitoring requirements to implement CWA and FLPMA requirements. What measures, criteria, and indices will be used, e.g., physical measures (such as channel and streambank stability), chemical criteria, and biological? What does "minimize" mean? BLM's policy for managing activities, including mining under the 1872 Mining Law, to meet WQS/beneficial uses needs to be clearly defined in the text. Consistency with the State water quality/nonpoint source (NPS) control program should be addressed (the discussion on page 2-6 only addresses BLM coordination in locating and identifying NPS pollutants). Similar concerns are raised by plans to prohibit utility projects "which would have long-term adverse effects on riparian/aquatic systems" (page 3-38), and to have "short-term sediment yield increases" from vegetation treatments (page 4-49). What are allowable short-term impacts? How long? The methods to be used in the activity plan NEPA documents to predict effects on WQS/beneficial uses should also be decribed in the RMP/EIS.

There are several other questions of RMP/EIS consistency with the above (even though compliance with federal and state water quality standards was a planning criterion (page 1-5)).

74 o We would like to see the affected environment chapter establish more clearly the existing WQS, including designated beneficial uses and antidegradation requirements, and status and trends (to the extent of available information) similar to the discussion of air quality standards. Also, we suggest that Chapters Two, Three, and Four address water quality, WQS, and aquatic systems/habitat in an integrated manner in aquatic resource sections. The aquatic resource requirements of the CWA and FLPMA should be described as part of the planning framework and objectives.

23 o We commend the BLM for including aquatic habitat conditions (page 2-14) and plans for intensively managing 70 miles of stream "to restore and protect aquatic habitats" (page S-6). Does the amount of planned improvement conflict with the amounts stated in Chapter Four? For example, 40 miles of improvement is planned under the riparian program and 60 miles is planned under the grazing management program (page 4-53).

79 What are at least the general aquatic life/habitat standards and/or objectives to be achieved (page 3-44)? One management concern is to "Identify high potential fisheries requiring improvement and mangement" (page 1-7). Consistency with the CWA should be provided since the CWA does not distinguish between degree of aquatic life potential (Section 101(a)). Fisheries improvement plans should: correlate to impairments of WQS; include consultation with the Colorado Department of Health (CDOH) (since it administers WQS); and be consistent with CDOH priorities. If "existing condition" is maintained "on the balance of the aquatic habitat" (page 4-53), will any existing WQS violations be perpetuated? We like the strong approach to managing the riparian aquatic resources presented in Management Units C-4 and C-18 (pages 3-20, 26, and 27).

71 o The intent to improve "Aquatic habitat, . . . streambank stability, and water quality . . . for fair to good condition " in the Camel Back WSA appears commendable (Wilderness Technical Supplement page S-1). What are the measures for "good" condition under the CWA/WQS? It is not clear how results under non-wilderness management would be better or equal to that under wilderness management.

78 o Sources of drinking water from BLM lands are mentioned on page 2-6. What are the existing drinking water problems (if any), potential impacting activities, and water quality improvements needed?

77 o Numerous references to impacts to "local surface waters" are made. What is "local"? Protection under the CWA and FLPMA should be referenced.

44 o We suggest that oil and gas management requirements be included for Management Unit D-9 (page 3-38).

Control of soil erosion remains another concern. Of the 94,110 acres with erosion data, over 85,000 acres have either moderately or severely

81 "accelerated erosion" (page 2-4). Several areas have severe gully erosion (page 2-5). However, BLM proposes to have erosion control projects "if compatible" with livestock grazing and woodland production activities (page 3-43). This proposed policy is exemplified, for example, by plans to manage grazing to "increase sediment and salinity yields far above normal" for some areas (page 4-50). A reference to CWA compliance is not made. We believe that providing erosion and sedimentation control is a basic land stewardship responsibility even if it conflicts with grazing, timbering, and other uses. We ask that the RMP/Final EIS contain a more clearly defined action plan to address areas of accelerated erosion and to prevent new erosion problems. This action plan should also specify more detailed direction for erosion control priority in new and existing allotment management plans (AMPs). Also, it is not clear why erosion control projects would not be compatible with wildlife winter range and riparian management (page 3-43). We found that the disclosure of impacts on aquatic habitat from soil resource management to be insufficient on page 4-53 (only in-channel structures are briefly discussed).

80 It is unclear why livestock grazing use would be resticted on only 39,410 acres (page 3-45). Apparently, plans to implement AMPs contain questions on adequacy since erosion rates would be reduced "if" AMP objectives are met (pages 4-48 and 49). The RMP/EIS should include guidance for correcting readily observable problems that do not require long-term monitoring. The Conservation Alternative seems to be more sensitive and aggressive for range stewardship.

33 We ask that the coal unsuitability report be included in the RMP/EIS.

82 The draft RMP/EIS discusses the significant aquifers and provides a qualitative review of the water quality of each zone (page 2-7). Since the alternatives analysis addresses only surface water, it appears that trends and projected effects are not considered to be of major importance under the RMP. We encourage much more site-specific detail for the appropriate projects.

Riparian Areas and Wetlands

The draft RMP/EIS appears to provide a strong, general basis for the riparian area/wetland management program by:

1) continuing to inventory and monitor riparian areas,

2) improving the vegetation conditions on 6,320 acres of land "by implementing special protective and restorative measures" (page 3-43), and

3) by maintaining or improving "riparian zones in the remainder of the planning area" (page 3-43).

118 We have several concerns that we would like to have addressed in order to achieve more detailed management guidance in the RMP. We suggest a thorough description of how vegetation condition meets: 1) the BLM Riparian Area Management Policy "to achieve a healthy and productive ecological condition for maximum long-term benefits"; 2) the riparian values noted in the Policy's background statements; and 3) the Executive Order 11988 an 11990 (Floodplain Management and Protection of Wetlands, respectively) requirements to preserve, protect, and restore the natural functions of such areas. What are the specific standards/guidelines for improvement and protection of condition? How are the objectives consistent with CWA/WQS objectives? Are there to be any demonstration areas? Also, we ask that the Water Quality Control Division of the CDOH be informed of the priority areas of treatment so they can be incorporated into the CWA Section 319 NPS assessment report.

The Preferred Alternative either would or could allow various activities in areas of riparian/wetland/aquatic systems.

- o "Approximately 4,000 acres of riparian zones would be opened to mineral exploration" with lifting of existing mineral withdrawals (page 4-50). Associated surface disturbance "would lead to increased sedimentation and streambank instability on 25 stream miles of aquatic habitat" (page 4-53).
- o Some riparian areas would apparently be left "open to ORV use" and "would be subject to degradation" (page 4-54).
- o Coal development could be considered (page 3-38).
- o Forest management activities would take place with up to 60 to 100 acres of riparian vegetation being degraded (page 4-51).

Consistency of the above management direction with existing policies and executive orders should be documented. We found the draft RMP/EIS to lack sufficient criteria and standards for WQS/aquatic resource protection (under the CWA and FLPMA) to be applied to management of the above activities. Without such criteria and standards, for example, we support the Conservation Alternative which would withdraw riparian zones from mineral entry (page 4-32). Formulation of mitigation measures for impacts of coal development is mentioned on page 3-38. The final RMP/EIS should state BLM's mitigation policies, e.g., avoidance, restoration, compensation, etc., for riparian/wetland/aquatic resource impacts. It appears that leaving some areas open to ORV use contradicts the Preferred Alternative direction on page 3-43 under which most riparian areas would be improved with at least maintenance of existing condition for the rest.

The action alternatives rely heavily on intensive grazing management to improve riarian areas. We request more documentation of actual planned grazing management tools. This documentation should include more information on experience in using grazing management without riparian fencing to achieve adequate improvement and protection of multiple riparian values.

24 Table 2-5 lists 1,034 acres of riparian vegetation type. Much larger amounts of riparian zones are mentioned elsewhere. What is the correct amount of riparian area?

Monitoring and Evaluation

76 The draft RMP makes several references to monitoring. RMP implementation will be monitored (page 1-1). "Water quality . . . would be inventoried and monitored" (page 3-29). The riparian zones would have intensive "aquatic habitat" monitoring (page 3-38). While we commend these planned initiatives, we request that the document go farther in describing the comprehensive CWA monitoring program in an appendix or monitoring chapter. The monitoring program (not plans for each activity) should include such information as: (1) goals and objectives, (2) types of surveys (ambient, intensive) or assessments to be used, (3) parameters to be monitored, (4) management and environmental indicators (e.g., aquatic habitat, sediment delivery), (5) monitoring methodologies, (6) mechanisms for monitoring implementation and adequacy of best management practices; (7) the person/position responsible for monitoring, and (8) the feedback loop to achieve timely modification to activities. Refer to our scoping letter for other components. It would provide the basic framework for CWA monitoring (including WQS/beneficial uses) in the Resource Area. However, there is no assurance that this monitoring framework has been established. Groundwater monitoring should also be included as needed. The other agencies and public should be able to review and comment on this framework in the RMP/EIS. The RMP direction would then be applied in site-specific detail. The RMP monitoring program would help meet 43 CFR Part 1610.4-9 requirements that the "proposed plan" establish "intervals and standards" that "shall provide for evaluation to datermine whether mitigation measures are satisfactory". We could not find tha "intervals and standards". What is the early warning system to document existing violations or risk of potential violations of the CWA? Are there going to be reference streams? When are the water quality inventories and monitoring to be done (page S-3)? How are they designed to document protection of WQS benaficial uses, status, and trends?

76 Even though compliance with WQS is a planning criterion (page 1-5), it is not clear what is included in implementation monitoring regarding CWA/WQS compliance, and aquatic resources.

Areas of Critical Environmental Concern (ACECs)

101
102 The RMP/EIS alternatives contain different ACEC recommendations (Table 3-8). It is our position that the ACECs should be the same (area and size) for all action alternatives. Either they are or are not valid ACECs under FLPMA regardless of what the RMP/EIS alternative is. Management practices may vary by alternative, however, in order to reach the same ACEC protection objectives. Consequently, consistency with FLPMA requirements to "give priority to the designation and protection" of ACECs (Section 202(c)(3))is not clear. If areas where watershed, soils, WQS, wetlands, riparian areas, or municipal water supply concerns were considered, what management requirements will aubstitute for ACEC designation? We would like to see an appendix that describes all potential ACECs recommended by BLM staff or others, reasoning for not recommending any particular area (if any) in the RMP/EIS, and any special management the area(s) may need. Also, we believe that management plans (including inter-agency and public review) are needed for all ACECs; however, it is not clear that such plans are to be done.

Threatened and Endangered Species

27 The preferred alternative would have a commendable intent to "Require measures to protect T & E species, individuals, and habitats in plans for all surface disturbing activities" (page 3-43). However, this intent appears to be contradicted in Chapter Four where statements are made that the preferred alternative would "seriously accelerate destruction of the Uinta Basin hockless cactus" (a threatened species) in the North Delta ORV area, and result in a "loss of 10,000 acres of potential habitat for the Uinta Basin hookless cactus and Delta lomatium due to recreational ORV use" (pages 4-51 and 52). We would like to see additional direction/documentation for the RMP action alternatives for compliance with Endangered Species Act requirements for doing everything possible to conserve such species (Sections 2(c)(1) and 3(3)). We would like to see the impact analysis address in more depth both indirect and cumulative impacts under 40 CFR Parts 1508.7 and B (with a distinction between the two). For example, the section on cumulative impacts briefly addresses impacts to potential habitat, rather and existing species and their habitat. Also, what is the basis for determining priority of ORV use over protecting T & E and/or candidate or sensitive species?

Other Concerns

75 The BLM states that there is some coordination with the State in locating and identifying NPS "water pollutant sources", and that input to the State's biennial water quality assessment under CWA Section 319 is made. We would like to see an RMP/EIS implementation chapter or appendix recognize action to be taken in response to existing/potential impairments identified in the 305(b) assessment, and the inter-agency coordination and consultation strategy for WQS-related programs. The RMP should identify procedures that will be used to ensure consistency with water quality management plans for the area.

The new Clean Water Act amendments were passed in February 1987. A primary concern is the new NPS control program (Section 319). BLM cannot match other Federal (EPA) dollars, but allottees, private land owners, and private organizations can and do plan to participate in the program. Some of this work may be done on BLM lands. How will BLM participate in work on

75 mixed-ownership watersheds to improve water quality? BLM is asked to provide an assessment of condition of their water bodies to the State as part of the assessment phase of the Section 319 management program. Additionally, the State will be identifying in its Section 319 management program the Federal programs/projects that it plans to review under Executive Order 12372 for consistency with the State's NPS management program. BLM involvement in this process should be described. The State of Colorado contact person for the NPS program is Greg Parsons in Denver (331-4756).

We suggest that the implementation chapter or appendix list the specific inventories, assessments, and management plans/projects to be done (in priority order) along with anticipated costs and schedule for completion. Of particular concern to EPA to have included are: WQS/aquatic life assessments; watershed and related management plans; salinity control plans; cooperative management plans; wetland and riparian area inventory and management plans; and groundwater studies. We feel that the RMP/EIS should address the commitment of the Resource Area office to annually request the funds needed to implement these projects. What is the linkage of the budgeting process to implementation of RMP-identified projects?

25 Extensive site-specific project planning and impact analysis/disclosure under NEPA will be done under this broad RMP/EIS. We believe that there will be a continuing need for public and other agency involvement in planning some of these projects (rather than just having the analyses available in the BLM office). The stategy for this involvement remains unclear and should also be addressed in more detail in an implementation chapter or appendix.

STATE OF COLORADO ROY ROMER, Governor

DEPARTMENT OF NATURAL RESOURCES

1313 Sherman St., Room 718, Denver, Colorado 80203 866-3311

Geological Survey 9
Board of Land Commissioners
Mined Land Reclamation
Division of Mines
Oil and Gas Conservation Commission
Division of Parks & Outdoor Recreation
Soil Conservation Board
Water Conservation Board
Division of Water Resources
Division of Wildlife

November 5, 1987

Robert E. Vecchia
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

State agencies have completed the review of the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statemant. We offer the following comments on the management alternatives and their effects on the important resources of the area.

Wildlife

From the perspective of wildlife and wildlife recreation, the Division of Wildlife prefers the Conservation Alternative. This alternative would best conserve and protect wilderness, wildlife habitats, watersheds and recreational areas. This high level of natural resource conservation is justified in light of the significant economic values of wildlife and recreation in western Colorado.

The Division, in cooparation with the Bureau of Land Management (BLM), has a bighorn sheep reintroduction program currently underway in the Gunnison Gorge. The two agencies should make arrangements to continue and enhance this program.

83 The Gunnison Gorge area is a Gold Medal fishery which should be maintained and enhanced. Protection of the surrounding watershed and associated resources are necessary to protect the fishery. The Conservation Alternative emphasizes this protection; however, other management options are available and should be considered if this alternative is not selected.

85 Protection of the most critical wildlife habitats in the Uncompahgre Resource Area, riparian areas and big game winter range, is essential. The proximity of BLM public lands to private lands at the lower elevations maximizes available opportunities to enhance these critical wildlife ranges. The Conservation Alternative will not consider disposal of public lands. Rather, private land exchanges would be emphasized to obtain crucial big game winter ranges, riparian zones, and waterfowl areas. Public access to public lands would be acquired.

The importance of riparian habitat warrants its careful analysis and management. The number of acres of riparian habitat is not consistently referenced in the RMP. Riparian habitat is shown as 1034 acres (2-8), 6,320 acres (4-34), and 4000 acres (4-54). It is imperative to analyze potential impacts on an accurate number of riparian acres. 24

The DEIS lists the principal proposed riparian restoration management actions as:

1) limit forage utilizetion to 35% on 6320 acres (4-51);

2) "intensive" grazing management on 5125 acres(4-51); 7

3) removal of grazing from March 1 to May 15 (4-54); and

4) reduction of livestock allocation by 200 AUMs on several grazing allotments (4-54).

The EIS should describe how each of these measures would contribute to the restoration of riparian areas. For example, how will the reduction of 200 AUMs on seven allotments improve riparian areas? Grazing should be restricted in all riparian areas at all times of the year, since recruitment of native woody vegetation will be nonexistant in riparian improvement areas unless grazing is removed. 119

Minerals and Energy Resources

The state has no significant disagreement with the preferred alternative with regard to mineral and energy resource development. The Mesa Verde coals in the Paonia area will ultimately be the most economic to produce. The preferred alternative allows mining to occur in this area. The Dakota coals which are thin and have not been economic to date are also reserved for future production if conditions warrant. Reservation of the Gunnison Gorge area for wilderness will not significantly affect the ultimate coal production of the area.

There has been limited oil and gas exploration in the area to date. There is methane potential in the Muddy Creek area near Peonia. The preferred alternative allows development of these resources when feasible. Finally, sand and gravel in the Nuncos shale area is surface minable in the Adobe Flats area and the preferred alternative allows production of this resource in the future.

Recreation

The discussion on recreation is very general and does not include information on the types and levels of current recreation use. This information would assist in assessing how well the preferred alternative responds to multiple use demands. Under the preferred alternative, 82 percent of the resource area is open to offroad vehicle use. The plan should describe the demand for this use and tailor access to the area accordingly, rather than allowing virtually unrestricted use and corresponding impact throughout the entire area. 53 67

Wilderness

We support the recommendation in the plan of 21,030 acres of Gunnison Gorge for wilderness designation. This land is a geologic continuation of the Black Canyon of the Gunnison containing spectacular waterfalls and offering outstanding fishing, hiking and river boating challenges.

The Camel Back wilderness study area also has outstanding wilderness attributes. Its colorful deep canyons and mesas create vast panoramic vistas and extensive recreation opportunities. As the DEIS states, mineral development in the area is unlikely over either the short or long term. This area appears deserving of designation although the Division of Wildlife is concerned that access for management and recreation purposes be provided. At the same time, the proliferation of roads similar to that which has occurred in nearby areas should be avoided. We would like to see this issue cooperatively worked out to allow eventual designation of the Camel Back area. 136

Special Management Areas

The EIS should present information on remnant or relict plant communities in the resource area, including those suitable for special management consideration. Recent data indicate the presence of high-quality riparian vegetation along the Uncompahgre River (T47N R8W5 32 NE1/4 SE1/4) and sagebrush vegetation in Wells Gulch (T45 R 3E, portions of sections 16,19,20,30 and T14S R 93W, portions of sections 26 and 35). The Colorado Natural Areas Program will work with BLM to identify and evaluate appropriate high quality vegetation sites for spacial management consideration.

We recommend that each special management area contain information and management provisions on all relevant information on each of the sites: 1) grazing, 2) OHV use, 3) camping-public access, 4) utility corridors and 5) mineral entry. This is necessary to protect important features of each area. For example, livestock use in the proposed Escalante Canyon ACEC has severely degraded Sclerocactus glaucus (federal-threatened) populations, yet no special provisions for grazing are presented. 28 94

The RMP should include discussion of the 1986 recommendations of the BLM Geologic Advisory Group. Recommendations included the designation of 1800 acres of Chuzar Canyon and recognition of the Ute Indian Fault zone within the proposed Gunnison Gorge recreation Area. The EIS should indicate the proposed change in status for Needle Rock from a BLM Research Natural Area to an Outstanding Natural Area as supported by the advisory group. 37

Water

Any impact of coal management, locatable minerals management or oil and gas management which would injure an adjudicated water right, will have to be mitigated by a plan for augmentation approved in Water Court prior to the occurrence of the injury. 36

Rules requiring casing of oil and gas wells and mineral test holes would help minimize surface mixing and ground water degradation. Plugging and capping of test holes are governed by the Colorado Mined Land Reclamation Rules and Regulations. 38

Threatened and Endangered Species

Lands having populations of federally threatened or endangered plant species should not be released from federal ownership. Populations of clay-loving wild buckwheat have been documented at both disposal tracts mentioned specifically on page 4-52. Descriptions of additional disposal tracts (3,090 acres) should be made available for review. 100

Potential habitat for endangered plant species should be surveyed before oil and gas or mineral resource development occurs and avoidance stipulations applied to known populations. Threatened or endangered species in livestock or OHV areas should also be monitored to assess grazing impacts and loss due to OHV use or collecting. In particular, the document should discuss how development of the North Delta OHV use area will impact critical habitat for the Uinta Basin hookless cactus and potential habitat of clay-loving wild buckwheat and Delta tomatium. 104 27

Management practices should be implemented which enhance habitats for special interest species which have been historically impacted by agricultural development in the Fruitland Mesa area, such as sage grouse. The division of Wildlife will assist in identifying such management practices. 109

We appreciate the opportunity to review your draft management plan and look forward to continued cooperation with BLM as decisions implementing these plans are made.

Sincerely,

DENNIS W. DONALD
Acting Executive Director

DWD:nsh:7353

cc: State Agency Reviewers

STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM
Colorado State University
1313 Sherman Street, Room 718
Denver, Colorado 80203
Phone: (303) 866-3391

December 23, 1987

Mr. Gene Vecchi
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Gene:

I want to corract and clarify the comments submitted by the Colorado Department of Natural Resources in the November 5, 1987 letter for the Colorado Natural Areas Program on the draft Uncompahgre Resource Area Management Plan and Environmental Impact Statement.

Information contained in the special management areas section on page 3, paragraph 3 is erroneous -- legal descriptions are wrong and the specific reference to Wells Gulch should be deleted. The first paragraph in the special management areas section should read as follows:

The EIS should indicate that a systematic survey for raltct or remnant plant communities has not been conducted in the Uncompahgre Resource Area. A number of areas, including several riparian sites, may qualify for future special management consideration. The Colorado Natural Areas Program will work with BLM to identify and evaluate appropriately qualified vegetation sites for special management. 103

I hope that this clarifies any confusion concerning our recommendations. I apologize for sending you incorrect information. Please call me if you have any questions on our revised recommendations. Best wishes for the new year.

Sincerely,

David W. Kuntz
Director
Colorado Natural Areas Program

DWK:dat:8441

COLORADO NATURAL AREAS COUNCIL
Robert B. Hamlin, Chair • Tim Webb, Vice Chair
Robert L. Vandenberger, Colorado Wildlife Commission
Patricia Hickham, Colorado State Board of Parks and Outdoor Recreation
Dean Lacky, member • Richard E. Speight, member
John Wilkes, Colorado Board of Land Commissioners

Ken Kester
Governor
Chris Q. Kentz
Executive Director
Donal W. Kentz
Program Director

JOHN R. KAPPA
Attorney at Law
P.O. Box 790
Montrose, CO 81402
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10

November 4, 1987

Mr. Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 S. Townsend Avenue
Montrose, CO 81401

RE: Draft Uncompahgre Basin RMP/EIS and WTS

Gentlemen:

The City of Delta hereby submits the following comments concerning the draft RMP/EIS and WTS for the Uncompahgre Basin Planning Area.

1. Generally the documents fail to adequately identify and discuss the development of hydro power resources on the Gunnison River and in the Gunnison Gorge as a specific resource or planning issue.

54 2. The description in the discussion of the Gunnison Gorge WSA on page 2-20 is devoid of any analysis of potential power projects.

3. The Wilderness Technical Supplement is totally inadequate and inaccurate concerning its analysis of hydro electric projects within the Gunnison Gorge by making the following unsubstantiated and erroneous assumptions.

A. Economic feasibility of these hydro projects is low.

B. The projects will not be developed.

C. The impact due to precluding development is negligible.

D. If the projects are developed, positive impacts will be negligible.

71 4. The failure to analyze the social and economic impacts of wilderness designation is erroneous. Preclusion of hydro power and water projects will have a dramatic adverse economic effect.

DEL 2/15

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Mr. Robert Vecchia
Page 2
November 4, 1987

5. The discussion of City of Delta water rights decrees on the Gunnison in the Gorge on pages 3-15 and 3-16 of the WTS is incomplete because it does not recognize that the City's decrees is also for consumptive uses for municipal and industrial purposes.

6. The discussion on page 3-16 of the WTS concerning the alternative proposals for development is misleading. Such proposals are being considered in consideration with the legislation to create a Black Canyon National Park and Wild and Scenic River. Under the Wild and Scenic Rivers Act, the City of Delta is entitled to just compensation for what amounts to a taking of its water rights. The City has been willing to discuss alternatives to development of its project in the context of the Black Canyon National Park proposal because it recognizes that other benefits will accrue to the City from that proposal. The amount of water proposed to be traded to the City as compensation clearly demonstrates (understated as it is) the considerable value of the City's water rights.

71 7. The conclusion on page 4-12 of the WTS that the impact of not being able to develop hydro electric power projects is negligible is totally erroneous for the following reasons:

A. Notwithstanding the exception for presidential action, wilderness designation will preclude any possibility of developing the projects.

B. Wilderness designation will make it virtually impossible for the City of Delta to perform the necessary due diligence work in order to keep its conditional rights in the Gorge. This will result in substantial detrimental economic effects.

C. The City of Delta will lose the many thousands of dollars it has invested already in these water rights and will lose the potential benefits from the eventual development of its project.

D. The conditional water rights in and of themselves are very valuable. Loss of these rights will allow projects such as the City of Aurora's Transmountain Diversion Project to obtain decrees for unappropriated water which otherwise may not be available. This will result in all of the very substantial impacts related to such a transmountain diversion project.

DEL 2/15

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Mr. Robert Vecchia
Page 3
November 4, 1987

71 E. Such conditional rights have value to developers of water rights who might want to develop other projects but need to promote the priority of their rights by purchasing rights such as the City of Delta and thereafter abandoning them to the stream or transferring them. Such value is eliminated by the Wilderness proposals.

10 8. The documents also ignore the fact that development of hydro electric power would not carry with it many of the adverse environmental effects associated with coal or nuclear power.

Very truly yours,

CITY OF DELTA

John R. Kappa
Delta City Attorney

JRK/vl

DEL 2/15

11

Robert E. Vecchia, RMP Team Leader
BLM, Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The Montrose District Advisory Council submits the following two resolutions (as adopted October 29, 1987) for your consideration in the RMP process.

RESOLUTION 1: The BLM should recommend that the Gunnison Gorge be made a Wilderness Area to be administered by the BLM.

RESOLUTION 2: The BLM should adopt the preferred alternative after reviewing and resolving the following issues:

13 A. The plan should identify specific management measures for riparian areas, and should better define riparian zones.

68 B. Canelback and Adobe Badlands WSAs should be reconsidered for
136 wilderness recommendations.

67 C. More attention should be focused on managing future increases in off-road vehicle use.

3 D. The RMP should identify trade-offs and show economic data dealing with land and water management proposals.

102 E. Study areas (natural, undisturbed ecosystems) should be established.

30 F. The location of the proposed right-of-way corridor should be given a closer look.

Sincerely,

Clay V. Bader, Chairman
Montrose District Advisory Council

Bureau of Land Management
2405 S Townsend
Montrose Co 81402
District manager
Dear Sir.

RECEIVED
MONTROSE OCT 30 1987 BLM COLO.

121 The Montrose Grazing Board unanimously voted to authorize James Suckla - Chairman of the board - to draft a letter opposing the reduction to 35% use on the Uncompaghre E.I.S. and to recommend moderate use in critical Riparian areas. The permittees not affected by Riparian areas to maintain full grazing preferences on AUM's

Board member Jack Musser inspected some of the areas and felt we were justified to make this recomendation.

Sincerely

Chairman Grazing Board
James Suckla

601 Canyon
Boulder, Colorado 80302
303•449•5595

SIERRA CLUB SOUTHWEST OFFICE

September 17,1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I have read your wilderness recommendations for three desert roadless area which is contained in your draft Uncompahgre Basin Resource Management Plan.

I would like to thank you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for Wilderness protection. This will help increase the chances of the Gunnison River to be considered as a Wild River under the Wild and Scenic Rivers Act. Because this area will be protected as a wilderness, thousands of visitors will still be able to enjoy the beauty and the recreational benefits of this area in the future.

68
136 I do feel that the BLM needs to reconsider recommendations for Camel Back and Adobe Badlanda as a wilderness. I do not understand the BLM's approach to their ideas ofmanagement of a shrinking resource such as wilderness. Camel Back and Adobe Badlands are juat a few of the potential wildernesses left on the plateau. According to BLM's reporta, there are absolutely no resource conflicts with wilderness designation in these areas. In Camel Back, BLM has mentioned that there are no timber or mineral conflicts. There are four dry oil and gas wells which has been drilled nearby Adobe Badlands, which indicates a low potential for minerals. Both areas contain many species of plants and animals which are considered endangered under old mangement. There is no telling how many more species will become endangered in the near future if nothing is done to protect them.

68
136 I feel that the BLM needs to reconsider their recommendations that the Camel Back and Adobe Badlands as a non- wilderness area.

Thank You,

John Bradley
Internship
Southwest Office

540 N. 5th St.
Montrose, CO 81401
Sept. 25, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Gene:

As I will be unable to attend the September 29th hearing regarding wilderness recommendations in the draft Uncompahgre Basin Resource Management Plan, I would like to take this opportunity to comment on the plan. First, I would like to thank the BLM for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Second, I would like to request that Camel Back (Roubideau Canyon) also be designated as wilderness. This status would benefit several endangered plant species as well as big game herds. The fact that this area

136 has no resource conflicts gives further argument

136 to its being designated as wilderness.
Third, I would like to ask that the BLM recommend the Adobe Badlands for wilderness status as well. This area contains Unita Basin hookless cactus, an endangered species, and has a low potential for minerals. There is no timber and, since the BLM intends to close the area to ORVs, there is no reason why this area should not be designated as wilderness.
68 Fourth, I oppose the BLM's stance on the Storm King ski area site. The impact on elk calving habitat as well as mule deer fawning is too great and the 5-year grace period for developments is preposterous.
69 I hope you will take my input into consideration.

Sincerly,
Babs Schmarbe
Colorado Mountain Club
Conservation Chair
for the Western Slope

resource preservation and be sold for a nominal fee to cover the cost of printing.

124 3) An interpretive prehistory display should be assembled with representative types of artifacts from the basin and include photographs, charts and resource preservation information. The display could be housed at the Ute Museum, Montrose County Historical Museum or other high-profile facility.

4) Develop presentation that could be shown to tourists, local civic groups and schools on archaeological topics.

5) Actively pursue mitigation of damaged archaeological sites.

6) Involve local groups interested in prehistoric and historic resources with the implementation of the above recommendations.

7) Patrol areas that contain high site densities and monitor site damage and conditions.

125 8) Restrict ORV use in high site density areas to existing jeep roads and close jeep roads that aren't necessary.

In conclusion, I would like to emphasize that the BLM has a timely opportunity to address the cultural resource management problem. Your decisions concerning the RMP will set the tone for future generations and hopefully preserve the unique cultural resources of the Uncompahgre Basin.

Sincerely,
Bill Harris
Bill Harris

THE COLORADO ARCHAEOLOGICAL SOCIETY
Publishers of Southwestern Lore

October 20, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I represent the Chipeta Chapter of the Colorado Archaeological Society, and presented verbal comments on the BLM's Draft RMP for the Uncompahgre Basin at the September 29, 1987 hearing in Montrose. I won't repeat verbatim what I said that evening since it is part of the official record, but would like to make additional comments on several key points.

The members of the archaeological community in the Montrose area are extremely concerned about the current rate of destruction of archaeological resources. The law enforcement approach to cultural resource management has limited value. Innovative approaches must be developed, and public education concerning cultural resource appreciation and preservation should receive high priority. The Draft RMP, Preferred Alternate takes the right, first step, but much more can be done. Some recommendations are listed below.

123 1) Conduct an intensive archaeological resource survey on BLM lands between Highway 90 and Roubideau Creek.

124 2) Publish a booklet that interprets the prehistory of the Uncompahgre Basin based on archaeological studies done in the area. The booklet should be easy-to-read, well-illustrated, include reasoning for

colorado environmental coalition

2239 E. Colfax Ave. Denver, CO 80206-1290 393-0466

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

October 23, 1987

Dear Mr. Vecchia,

I would like to make comments on behalf of the Colorado Environmental Coalition in regards to the Uncompahgre Basin Resource Management Plan. The Colorado Environmental Coalition was formed in 1965 to work for protection of Colorado's environment. The organization has 40 member groups with a combined membership of over 35,000 people.

Overall, we found the plan to be very vague. It did not really quantify the impacts. The plan uses subjective terms, such as "substantial," "potentially improve," etc. instead of quantified 22 data. We view these subjective comments on impacts as being poorly conceived and we want actual numbers to allow the public to better understand the impacts.

Coal

One of the most disturbing aspects of the preferred alternative's coal leasing proposal is the area open to coal leasing. 83,334 acres are open to further leasing consideration. Under the current management alternative, which we would more readily 32 support, the acreage open to coal leasing would be 20,727 acres. This is a much more realistic figure considering current and foreseeable market trends. This would also allow for better protection of the environmental quality of the North Fork Valley because the BLM could select the areas, which would be the least harmed by coal production, for further consideration.

The Plan found only 569 acres of land out of the 83,396 acres in the coal planning units to be unsuitable for further leasing consideration using the unsuitability criteria. This is obviously a very narrow interpretation of the unsuitability criteria. 33 Substantial acreage in the North Fork drainage should be found unsuitable on the Scenic Areas criterion alone. Alluvial valley floors are also located in the coal leasing area. It would seem to be appropriate that the EIS devote a section or an appendix to the lands that have been eliminated from further consideration

under the unsuitability criteria, and explain the methodology used for determining unsuitability. This is one of the few RMPs where the reader is not provided with this basic information. A good example of where an area should have been found unsuitable under the Scenic Areas criterion is the higher elevations of the Adobe Badlands WSA. This badlands area is obviously one of the most scenic areas in the Uncompahgre Basin Resource Area. A reevaluation of the unsuitability criteria obviously needs to occur in the Final EIS.

The plan inadequately addresses multiple-use trade-offs. The only discussion of multiple-use trade-offs occurs on page 1-9, stating "These multiple-use trade-off decisions will be made during the RMP-EIS process." It appears that the only multiple-use trade-offs made were by setting certain coal production occur on lands that did not contain producible coal reserves. An example of a BLM Resource Management Plan that did examine multiple-use trade-offs is the North Dakota RMP and EIS. We recommend that you take a close look at this document when preparing the final EIS.

The Federal Coal Management Program EIS of 1979 also requires that thresholds be established on impacts to a variety of other resources. Since this concept was not augmented by anything in the 1984 Supplement to the EIS, it is still in effect. We maintain that the RMP must address thresholds particularly for wildlife and socioeconomic capabilities of the surrounding area.

The Secretarial Issue Document of 1986 requires that the RMP assess the coal development potential of the area. The reason that this should be covered in the RMP is so that leasing levels can be in line with demand levels. The Uncompahgre Basin RMP states on page 4-44 that "The possible leasing of up to 5,730 million tons of coal would far exceed demand over the life of this plan as the 1985 coal production from Delta and Gunnison counties was 2.2 million tons and optimistic annual coal production forecasts for this area range from 3.5 to 7.35 million tons for the years 1990 to 2000." The plan continues on page 4-45 to state that "this [preferred] alternative is not anticipated to impact coal production levels over the life span of the plan." The Plan blatantly ignores the realistic coal development potential of the area, and needs to be reworked.

The Secretarial Issue Document (1986) also requires the BLM to give "increased emphasis" to six criteria that other agencies, the OTA, and public interest groups wanted added to the 20 unsuitability criteria. Among these other criteria are effects coal mining will have on wetlands/riparian habitat, sole-source aquifers, lands adjacent to Class I air quality areas,

reclaimability and buffer zones around National Park Service areas. None of these criteria were examined thoroughly in the Plan. In fact, the plan only briefly mentions riparian areas and makes the following statement in regards to aquifers on page 4-63, "The mining of coal and locatable minerals could result in the permanent and irreversible loss of ground water though diversion and subsidence," which we find totally unacceptable. Basically, the BLM needs to conduct not only a much more thorough investigation into these six criteria, but also into the entire federal coal management program in the Resource Area.

Oil and Gas

The section on oil and gas impacts is inadequate. The court case of Conners v. Burford states "cumulative impact analysis of cumulative impacts on several oil and gas activities must be done before a single activity can proceed." The Preferred Alternative of the Plan dedicates only seven paragraphs to the impacts of oil and gas leasing and only one paragraph deals with cumulative impacts. No leasing was recommended only for the Gunnison Gorge, an area recommended for Wilderness. No Surface Occupancy was recommended for the Needle Rock Outstanding Natural Area. It appears that the BLM has chosen to ignore its legal mandate under Conners v. Burford. Another section of Judge's decision is applicable here, stating that federal agencies "have initiated a pattern of procrastination, not examination of environmental concerns." The BLM is capable of doing an adequate job of assessing impacts, so why not do it? The Plan should also mandate that all ACECs and other natural areas receive for a minimum No Surface Occupancy stipulations.

Tract Disposal

The BLM has not outlined sufficient criteria for determining tracts available for disposal. This can be seen through some of the tracts slated for disposal such as the West Dallas Creek tract (T.44 N., R.5 W. sections 4 & 9). This area receives heavy recreational use and is located on a county highway. The tract is located on one of the main access points to the Mt. Sneffels Wilderness Area, and obviously should be slated for retention. Another poor selection as a disposal tract is the Baldy Peak Area (T.45 N. R.9 W. Section 36). Baldy Peak is a former Wilderness Study Area, which has the potential to be a future addition to the Big Blue Wilderness Area. The Ruddy Creek tracts above Paonia Reservoir also have heavy recreational use. The tract provides important public access points along Colorado Highway 133.

Obviously, the Uncompahgre Basin Resource Area has not devised

adequate criteria for determining tract disposal. The Grand Junction RMP included 17 criteria which would automatically warrant retention of the tract. The criteria are as follows:

1. Wilderness areas and wilderness study areas
2. National conservation areas
3. Wild and scenic rivers and wild and scenic study rivers
4. National or historic trails
5. Natural or research natural areas
6. Designated areas of cultural or natural history
7. Designated areas of critical environmental concern
8. Designated wild horse areas
9. Other congressionally designated areas
10. Threatened or endangered species habitat areas
11. Riparian habitat areas
12. Valuable recreation areas
13. Wetland Areas as defined in Executive Order 11990 5/77
14. Flood plain areas (100 year) as defined in Executive Order 11988 5/24/77
15. Large blocks of land that are suitable for multiple use management
16. Lands containing water sources with valid existing water rights held by the BLM
17. Critical big game winter range

There are also criteria for areas with high mineral potential. We maintain that the criteria used in the Grand Junction RMP is much more useful and thorough than the 5 criteria used in the Uncompahgre RMP presented on page 1-6.

Changes in Management Prescriptions

We recommend the following changes in the mandates for the preferred management prescriptions, in addition to the comments made through the rest of the letter:

The D-6 management prescription should include a recommendation to acquire land in Red Canyon in order to have a more logical and ecologically sound boundary for the proposed Gunnison Gorge Wilderness Area.

We commend the BLM on realizing the significance of the Riparian areas within the Resource Area, but feel the agency has not gone far enough in insuring the protection of riparian areas in the plan. The D-9 prescription needs to allow the agency to implement a policy which will improve the quality and vitality of riparian areas. We support stricter limits for livestock use in these fragile areas, since livestock is probably the single greatest cause of deterioration of riparian habitat. The Plan,

however, must address the site specific impacts of coal development on riparian and aquatic areas as required in the Secretarial Issue Document (1986). Mineral development can also have significant impact of riparian areas, thus this mineral development (including oil and gas as well as coal) should be minimized.

We oppose the ski area proposed for Storm King Mountain under the D-10 management prescription. The D-10 area should be managed for elk habitat, and timber harvesting should be prohibited. Storm King is not only fantastic elk habitat, it is also an important scenic vista for much of Paradise Valley. The natural character of the area should also be maintained for this reason.

We have serious concerns for the resource uses which would be permitted in the D-2 and D-3 management prescriptions. Escalante Canyon is being recommended for an Area of Critical Environmental Concern and Preview is being recommended for a Research Natural Area because of their outstanding biological characteristics. It is amazing that the BLM realizes the significance of these areas, but allows potentially destructive activities to these lands to occur in the areas. The BLM should prohibit grazing in all ACECs, RNAs, and ONAs. Livestock have the ability of destroying the rare plants that are found in these areas. A Mineral withdrawl should also be placed on the areas to prevent potentially destructive mining and the possible converting of important lands to private lands using the claim and patent system. A No Surface Occupancy stipulation should placed on all oil and gas leases which may cover the area to protect the areas from damage due to oil and gas development. The BLM should also strictly control recreation especially in the Escalante Canyon ACEC. Camping and bathing should be banned. Uncontrolled recreational use can also damage the endangered plant species.

WilderLess

The Colorado Environmental Coalition supports the designation of the Camelback, Adobe Badlands and Gunnison Gorge as Wilderness. All three areas easily qualify for Wilderness protection and are deserving of designation.

Gunnison Gorge

The Gunnison Gorge is one of the premiere primitive recreational areas in the state. The area receives substantial boating, hiking and fishing use. Gunnison Gorge is immediately downstream from the Black Canyon of the Gunnison National Monument's Wilderness area, and would make an excellent addition to this area.

The Gunnison River has also been recommended for Wild River designation under the Wild and Scenic Rivers Act through the Gorge. The Gunnison Gorge is obviously one of the highest candidates for wilderness protection in the state of Colorado.

Adobe Badlands

These Mancos Shale badlands, located just a few miles north of Delta, are among of the most scenic places in the resource area. The badlands provide excellent vistas and are habitat for the endangered Uinta Basin hookless cactus. Since four oil and gas wells have been drilled near Adobe Badlands and all have been dry, the area also has low oil and gas development potential. Other conflicts with wilderness designation are also low. The BLM states in the plan that it intends to prohibit off road vehicle use in the area. If designated as wilderness, Adobe Badlands would diversify Delta's recreational opportunities and improve its tourist economy. The BLM does not really have a rationale for not recommending the Adobe Badlands for wilderness, and needs to reevaluate this decision.

68

Camelback

Camelback has absolutely no conflicts to Wilderness designation. Wilderness designation would be compatible with the current management of the area. The Uncompahgre Plateau is one of the major landforms of western Colorado, but not one acre of it has been designated Wilderness. Although officials of the BLM have often claimed that Dominguez Canyon proposed wilderness to the north of Camelback is almost identical to Camelback, we have found the areas to be quite different. Camelback has a much greater diversity of rock formations that are not present in Dominguez Canyon, making the areas look much different. Camelback contains habitat for the endangered apineless hedgehog cactus and the rare Grand Junction Milkvetch. The area is being considered for desert bighorn sheep reintroduction and for improvement of its riparian habitat in this plan. Both of these activities would be consistent with wilderness designation. Camelback is rare among BLM Wilderness Study Areas in that it also has a well developed network of trails making the area ideal for backcountry recreational use. The BLM has obviously erred in its recommendation of Camelback and should support the area for Wilderness designation.

136

ORV Use

The BLM has not effectively dealt with Off Road Vehicle (ORV) use in the plan. The prospect of having 82% of the resource area open to uncontrolled ORV use is frightening. We support substan-

67

tial reductions in the amounts of land, where ORV use would be permitted. It is especially disturbing to see the R-S management prescription (geared to ORV use) being located in habitat for the endangered Uinta Basin hookless cactus. This is obviously in violation of the Endangered Species Act. The plan admits that ORV use will have substantial adverse impact on soils, water, and vegetation. Much greater restraints must be implemented for ORV use.

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27

Utility Corridors

Although existing utility corridors were described in the plan (p. 2-24), no information was provided on where new utility corridors would be permitted. We support delineation of where utility corridors would be permitted. Restriction should be placed on all Wilderness Study Areas, Outstanding Natural Areas, Research Natural Areas, and Areas of Critical Environmental Concern prohibiting utility corridors.

94

Threatened and Endangered Species

It appears from the lack of information in the plan that the BLM has not conducted a survey of its lands to identify areas which contain threatened and endangered species. The BLM should include in the plan a mandate for conducting a study for not only threatened and endangered species habitat but also to identify remnant plant communities. Provisions should be made to amend the plan when this information has been collected.

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We appreciate this opportunity to comment on the plan, and hope that the agency will be responsive to our suggestions. Dramatic changes need to occur in order to make this plan acceptable.

Sincerely yours,

Kirk Koepsel
Public Lands Coordinator

1660 Lincoln Street Suite 404 • Denver, Colorado 80295
303/860-0099

October 29, 1987

Mr. Robert Vecchia
RMP Team Leader
Uncompahgre Basin Resource Area
Bureau of Land Management
2502 South Townsend Avenue
Montrose, CO 81401:

Dear Mr. Vecchia:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I would like to offer the following comments on the Draft Uncompahgre Basin Resource Management Plan (RMP) and Environmental Impact Statement (EIS). RMOGA is a trade association with hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. Consequently, we review all draft plans in this region to determine whether they provide equitable and reasonable treatment of mineral resources.

We would like to commend the BLM on its preparation of a clear, concise Draft RMP and EIS. We believe the plan as proposed represents a balanced approach to land management planning which adheres to the multiple-use concept mandated by Bureau policy. Moreover, the BLM's decisions are readily displayed and are easily understood by the reader. The use of oil and gas stipulations to protect other resource values appears to be reasonable, unbiased, and not designed to unduly constrain oil and gas activities in favor of other values.

We are disturbed by the lack of information displayed in the DEIS regarding oil and gas activities. We believe that in order to have a totally defensible document, the BLM must include a general description of what is involved when oil and gas activities are conducted on public lands. Specifically, the procedures and regulations which industry and the BLM must comply with regarding leasing, exploration and production activities should be generically discussed in the document itself, or in an appendix. Such discussion informs the public on how oil and gas activities are allowed to occur on public lands, and the process by which such activities are mitigated and approved.

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October 29, 1987

Mr. Robert Vecchia
RMP Team Leader
Uncompahgre Basin Resource Area
Bureau of Land Management

page two

In conclusion, RMOGA supports the Preferred Alternative as proposed by the BLM. However, we believe it is critical for the BLM to adopt our recommendation to include a general discussion of what takes place during oil and gas activities, and the procedures by which these activities are allowed to occur.

We appreciate the opportunity to provide our comments. If you have any questions or would like to discuss our comments in greater detail, please do not hesitate to contact us.

Sincerely,

Jess Cooper
Executive Vice President

JC:cw

MINERALS EXPLORATION COALITION
Minerals Advocacy in Public Policy

Mailing Address
Box 155
787 South Xanadu Court
Lakewood, Colorado 80228
(303) 232-4310

Reply to 18
Lakewood, Colorado
L.C. Lee

Washington Representative
L. Courtland Lee
2014 West Street
Landover, Maryland 20785
(301) 322-0762

October 29, 1987

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

The following comments constitute the response of the Minerals Exploration Coalition (MEC) to the Uncompahgre Basin Resource Management Plan and Draft Environmental Impact Statement (DEIS). The MEC represents companies and individuals engaged in exploration for locatable minerals on the federal leads.

The MEC supports the management goals of multiple use, giving consideration to all renewable and nonrenewable resources, including minerals.

We do not believe that sufficient minerals data has been collected or weight given to mineral resources to allow fair consideration of minerals in the management plan. Without a complete set of data on the mineral resources showing the location and extent of past and current mineral production and potential for future exploration and production, the importance of these minerals to the citizens of Colorado and the United States cannot be recognized. While the areas of past mineral production and areas with potential for future production are mentioned in a general way on pages 2-3 and 2-4 a map showing location and extent of these areas was not prepared. No rating of the mineral potential is shown for areas outside the WSAs. Within the WSAs, maps showing the location of the areas rated is lacking. 43

The absence of mineral data in comparison with the data on other resources is particularly evident when one considers the economic data shown in Table F-1, Appendix F, page A-19. This table shows that, except for government, minerals provide the largest source of personal income to the citizens of the region. Detailed information for some resources is included in the appendix but not for minerals. How can the largest source of non-government income be omitted?

The Minerals Exploration Coalition opposes the inclusion of areas of high and moderate mineral potential in wilderness areas because the opportunity to explore for and produce minerals is prohibited in wilderness areas, except where prior existing rights can be shown. The boundaries of the wilderness study areas that include moderate of high mineral potential should be changed to exclude the mineralized areas or the WSA should not be recommended for wilderness designation. 56

The Geology, Energy and Minerals (GEM) reports are cited as the basis for the determinations of mineral potential in the WSAs in the wilderness supplement. No reference is made to the required mineral surveys conducted by the U. S. Geological Survey and U. S. Bureau of Mines. The USGS-USBM minerals information should be available before wilderness decisions are made. 56

To show that mineral activities will be allowed on most (generally in excess of 90 percent) of the land, thereby implying that most of the mineralized land will open, is misleading when considering the lands to be withdrawn under the various alternatives. Minerals are unevenly distributed, therefore, without specific information on the location of the minerals one cannot determine the impact on the mineral industry of these proposed withdrawals. 43

We have not made a select of our preferred alternative because without adequate minerals we cannot make an intelligent choice.

Thank you for the opportunity to comment on this plan.

Sincerely,

John D. Wells

John D. Wells,
President

The AUDUBON SOCIETY of Western Colorado
Sun City Est. 1
Grand Junction, Colorado 81503

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Sir:

The Audubon Society of Western Colorado appreciates the opportunity to comment on the Uncompahgre Basin RMP and EIS. We offer the following comments and suggestions:

1. We believe the conservation alternative rather than the preferred alternative would better serve the national interest in almost every detail. We applaud your decisions which incorporate elements of the conservation alternative into the preferred alternative.

2. The conservation alternative recommends a wilderness designation for the Adobe Badland WSA and for the Camel Back WSA, but the preferred alternative does not include this recommendation. We believe this omission is a mistake. We support any action which will enhance the preservation of wilderness values, as this designation would. The economic advantages gained by not designating these areas as wilderness are short-term and negligable in comparison. 68 136

3. If the Camel Back area is not to be designated as wilderness, off-road vehicle use in the area should be prohibited nevertheless. The EIS states that ORV use would be the primary cause of decline in wilderness values under the preferred alternative. This alternative provides enough area for ORV use without allowing such use to destroy the wilderness value of the Camel Back WSA. 137

The preferred alternative also aims to "minimize disturbance" in this area to enhance habitat for introduction of bighorn sheep; allowing ORV use would certainly hamper this goal. Further, although the preferred alternative provides for bighorn habitat management, it fails to allocate forage for these animals. This failure could easily lead to the failure of the re-introduction. 4. The preferred alternative for the Camel Back area is confusing. The map for this alternative seems to label the area "D-1," which would be defined to "improve vegetation conditions and forage availability for livestock grazing." The description of Management Unit D-1, under the sub-heading "Soils and Water Resources," states that "nonconforming erosion control objectives, projects and mitigating measures would be incorporated." The "Comparison of Alternatives" chart, however, states that the plan is to "manage the Camel Back area with emphasis on riparian/aquatic system management, wildlife habitat and livestock grazing." We hope that the real priority is that described in this chart (if a wilderness designation is not forthcoming). At any rate, the designation needs to be clarified. 137

5. The preferred alternative takes the second-past approach to managing the Adobe Badlands area north of Delta. It is wise to put soil erosion control as the primary objective. Wilderness designation for the WSA within the area, however, would also meet that objective and would protect wilderness values as well. 68

6. The Wilderness Technical Supplement states that "the Proposed Action is based on an overall evaluation of wilderness values, analysis of conflicts with other resources, consideration of social and economic factors, and consistency with other plans." None of these evaluations, analyses, or considerations are discussed in the RMP. It is impossible for the public to provide adequate input on RMP decisions when the bases for these decisions are unknown. An analysis of the alternatives, such as that provided in the USFS RARE II EIS, would be most helpful. Because the Uncompahgre Basin plan contains no such analysis, it seems reasonable to request an amendment that includes this information and time for the public to respond to it. 4

Sincerely yours,

Richard Levad

Richard Levad
Conservation Committee
Audubon Society of Western Colorado

Sierra Club
Rocky Mountain Chapter
"...TO EXPLORE, ENJOY AND PRESERVE THE NATION'S FORESTS, WATERS, WILDLIFE AND WILDERNESS..."

Robert E. Vecchia
Bureau of Land Management
Uncompahgre Resource Area
2505 S. Townsend Ave.
Montrose, Co, 81401
Nov. 1, 1987

Dear Sir:

The following comments on water quality/soils/riparian aspects of the Uncompahgre Draft RMP and EIS are made on behalf of the Rocky Mountain Chapter.

This draft document correctly indicates that parts of (802) the Resource Area are plagued by moderate to severe soil erosion, leading to a substantial contribution to salinity levels in the Upper Colorado River Basin, as well as sediment. The document correctly states that about half of the dissolved and suspended water pollution is due to human activities, particularly poor grazing practices, mining, and ORV use.

The projected impacts on water resources of the Preferred Alternative also appear to be candid and correct, although the discussion of the impacts in the text is by no means clear. Impacts that are especially important to us are: permitted grazing on 89,000 acres of highly saline and erodible soils during the spring season, year-long ORV use on 25,000 acres of highly erodible and saline soils, and cancelling withdrawals for mineral exploration on 4,000 acres of riparian habitat. Our reason for these concerns may be stated succinctly: Clean water is probably (with the possible exception of bee flowers) the most economically important "output" from the Uncompahgre Resource Area. In comparison, ORV and other recreation, locatable minerals, and grazing are insignificant in the context of the whole Colorado River Basin. In this context, grazing, ORV recreation etc. are of local value only, whereas decrements in water quality parameters adversely affect the economy of the basin and the well-being of millions of people. Therefore the BLM must be much more aggressive in limiting uses that adversely impact soils/water/riparian habitat. Since the EIS appears to give at least a fourth-order approximation to a proper discussion of impacts, we urge the BLM to make the following changes in its management plan:

A. Reconsider the permitted season-of-use for livestock utilization of riparian zones and erodible areas in general. The parcels through many restrictions may not allow sufficient time for soil moisture and vegetative growth to decrease. Studies in other areas have shown that less than 10% soil moisture is necessary to prevent bank damage and soil compaction (see "Draft Technical Reference on Grazing Management in Riparian Areas", Sept. 1987, Gore Ranch BLM, Grand Junction District), and that this level of soil moisture is not reached until late July on average.

B. Grazing and ORV use should be absolutely prohibited on saline and easily erodible soils. A possible exception might be for certain grazing systems, but if, and only if, the permittee and the agency, through a credible monitoring program, can demonstrate to the public that the particular grazing system employed can increase the extent and vigor of ground cover and decrease erosion.

C. Minerals exploration and development, whether leased or placer, must not be permitted in or near stream channels undergoing conditions. The BLM must not withdraw existing withdrawals protecting stream channels and should initiate new withdrawals, if these are necessary to protect water quality and stream hydrology.

Despite numerous deficiencies in the Uncompahgre RA Plan and EIS as a planning document, one aspect that can be applauded is the creation of emphasis areas for riparian habitat management.

Provided that reasonable measures are taken by the BLM to protect soils and riparian zones in its grazing and ORV management programs, the Rocky Mountain Chapter would like to express its willingness to explore volunteer stream-restoration projects with the RA staff, as we have done in other areas.

Thank you for your consideration of these opinions.

Sincerely,

Kirk Cunningham
Conservation Chairman
For Tenta Br.
Boulder, Co, 80303

40 On 25,000 acres of highly erodible and saline soils, and cancelling withdrawals for mineral exploration on 4,000 acres of riparian habitat. Our reason for these concerns may be stated succinctly: Clean water is probably (with the possible exception of bee flowers) the most economically important "output" from the Uncompahgre Resource Area. In comparison, ORV and other recreation, locatable minerals, and grazing are insignificant in the context of the whole Colorado River Basin. In this context, grazing, ORV recreation etc. are of local value only, whereas decrements in water quality parameters adversely affect the economy of the basin and the well-being of millions of people. Therefore the BLM must be much more aggressive in limiting uses that adversely impact soils/water/riparian habitat. Since the EIS appears to give at least a fourth-order approximation to a proper discussion of impacts, we urge the BLM to make the following changes in its management plan:

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70 of soil moisture is not reached until late July on average.

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C. Minerals exploration and development, whether leased or placer,
40 must not be permitted in or near stream channels undergoing conditions. The BLM must not withdraw existing withdrawals protecting stream channels and should initiate new withdrawals, if these are necessary to protect water quality and stream hydrology.

Despite numerous deficiencies in the Uncompahgre RA Plan and EIS as a planning document, one aspect that can be applauded is the creation of emphasis areas for riparian habitat management.

DELTA COUNTY LIVESTOCK ASSOCIATION

November 4, 1987

ROBERT E. VECCHIA, RMP TEAM LEADER
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, CO 81401

FROM: DELTA COUNTY LIVESTOCK ASSOCIATION
John Kotti, President
R. 1 Box 14
Crawford, CO 81415

SUBJECT: UNCOMPAHGRE BASIN RESOURCE MANAGEMENT PLAN - COMMENTS

The Delta County Livestock Association is in agreement that the Camel Back, the Adobe Badlands and the Gunnison Gorge should continue to be managed as they now are by the BLM and prefer the no action alternative.

The 10,402 acre Camel Back area should continue, as it now is, under multiple use management. The area does not have the suitability for a Wilderness designation. The management plan now implemented is working well and the vegetation has already increased along the Roubideau River and Porter and Monitor Creeks.

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For several months each year these streams are dry. Damage by flash flooding governs plant growth along stream beds, not grazing by livestock. Because of the terrain, this area is subject to several flash floods each year.

Introducing big horn sheep into the area would only compete with the deer and elk now using these winter ranges. Private lands would be overrun by these animals needing forage in the winter.

111

131 The 680 AUMs allocated for livestock grazing should remain unchanged.

68 Neither is the Adobe Badlands suitable for Wilderness. All these natural
131 resources should be utilized under multiple use and the 878 AUMs allocated to livestock grazing should remain the same.

The Gunnison Gorge should also continue under multiple use. Proper management increases riparian habitat. The 662 AUMs currently allocated for
66 livestock grazing should not change.

One reason these lands are being suggested as Wilderness Areas is because the rancher appreciates the land and its value to the area. Thus they have properly utilized and managed them in cooperation with the BLM.

Sierra Club
Rocky Mountain Chapter

"...TO EXPLORE, ENJOY AND PRESERVE THE NATION'S FORESTS, WATERS, WILDLIFE AND WILDERNESS..."

November 3, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Ave.
Montrose, CO 81401

Dear Gene:

Enclosed are comments for the Rocky Mountain Chapter of the Sierra Club on the Draft Uncompahgre Basin Resource Manageeent Plan and EIS, and the accompanying Wilderness Technical Supplement (WTS). The Sierra Club currently has over 8,300 eembers in Colorado, many of whom eake recreational use of the public lands adeinistered by BLM in the Uncompahgre Basin Resource Area.

WILDERNESS

The Sierra Club has several generic concerns with BLM's analysis of wilderness resources in the DEIS and WTS. A eajor concern appears on the very first page of the WTS (S-1) where BLM notes that "eultiple-use eanageeent would continue" with non-wilderness designation of
71 Caeel Back WSA. Is BLM aware that wilderness, and the resources it protects, is a fore of multiple use? Is BLM aware that the Wilderness Act itself (Section 4(a)(i) of PL 88-577) specifically amends the Multiple-Use Sustained-Yield Act to note that wilderness is not inconsistent with eultiple-use ?

Another concern centers on the presentation of information. Nowhere is any rationale given for BLM's wilderness recoemendations, some of
2 which seem to fly in the face of reality. It would treeendously improve the ability of the public to intelligently coeeent on BLM's manageeent proposals if we had soee inkling of the thinking behind these proposals.

The Sierra Club strongly endorses the BLM's preferred alternative recommending all of Gunnison Gorge WSA for wilderness designation. Wilderness designation will greatly enhance BLM's previous
66 recoeeendation of the Gunnison River through the WSA for Wild and Scenic River protection, and will also provide added impetus to ongoing efforts to secure legislation that formally designates both the river as Wild and Scenic and the WSA as wilderness.

2239 E. Colfax Avenue, Denver, CO 80206 303/321-8292

BLM's unsuitable recommendation for Camel Back WSA, however, appears to us to be without merit. The Wilderness Technical Supplement makes clear that there are no resource development conflicts with timber or mineral resources. Similarly, the current inaccessibility of the area has thus far insulated it from significant conflicts with ORV use. On the other hand, there is an impressive array of wilderness dependent values present in the WSA, as BLM itself has noted. These include crucial big game winter range, habitat for threatened and endangered species such as golden and bald eagles as well as rare plants and plant associations, a substantial perennial streae, the Ben Lowe Cabin historic site, stunning scenery, and uncoeeon geologic features such as hoodoos. By anyone's definition, Camel Back has all of the requisite requirements for a wilderness, and few conflicting resource demands. The area also faces likely future degradation of its wilderness values without wilderness designation, as the WTS notes, in the form of intrusions by ORVs such as all-terrain-vehicles. All of these, coupled with the excellent manageability of the area due to its compact topographic boundaries, indicate that BLM should recommend Caeel Back as suitable for wilderness designation.

136 One particularly unique aspect of Camel Back is its position as an integral part of the longest intact roadless drainage on the entire Uncompaghre Plateau. The 7 or 8 miles of Roubideau Creek within the WSA, when combined the 15 miles of undeveloped canyon on the adjacent upstream National Forest, eake this drainage the only continuous, roadless drainage that comprises the full range of ecosystems present on the Uncoepaghre Plateau, from the aspen-spruce forests of the divide to the sparse desolation of the uplands above the lower canyon. How does BLM consider the value of a unit such as Camel Back which is unique in its contribution to protecting an entire ecosystem? Surely, ecosystem protection is one of the greatest priorities of the National Wilderness Preservation System, and Camel Back is a rarity in providing such a distinctive opportunity on a landform (the Uncompahgre Plateau) which currently has no designated wilderness. Has BLM taken the non-wilderness designation of the Roubideau RARE II area to eean that Congress opposes wilderness
60 protection for this drainage? If BLM has, then it is in violation of Congressional intent as spelled out in the committee report which accompanied the 1980 Colorado Wilderness Act.

The only potential conflict with wilderness designation of Camel Back that was identified at public hearings was with livestock grazing, primarily over the issue of finding additional water sources for livestock outside of the Roubideau Creek riparian area. First of all, the Sierra Club strongly supports the reduction in forage utilization to 35 percent on 1,400 acres of riparian zones in the WSA (WTS at 2-2). It is obvious to even the most casual observer that the Roubideau Creek riparian zone has been thoroughly trashed by livestock use. The ranchers present at the Montrose hearing indicated that they thought

this would be a hardship on them, though it might be easily implemented through more active eanageeent of the livestock herds in the riparian zone rather than simply leaving the livestock to slowly drift along the creek. Some of these ranchers also indicated that this hardship could be greatly relieved if additional water sources were made available on Winter Mesa. If, indeed, the prieary conflict with wilderness designation of Camel Back is the issue of grazing in the riparian zone of Roubideau Creek (though this does not appear to be the case since BLM is proposing a reduction even in the no
52 wilderness alternative), then BLM would be reeiss in not considering an alternative in the WTS that proposes wilderness designation for the majority or all of the WSA while providing for additional water sources for livestock on Winter Mesa. Will BLM consider such an alternative?

131 What is the meaning of the stateeent that grazing allocation in Camel Back will be reduced from 680 AUMs to 480 AUMS, "which would be
134 managed under an intensive grazing system"? Does BLM intend to implement an HRM intensive grazing system for these allotments?

The Sierra Club supports wilderness designation for Adobe Badlands WSA. As with Camel Back, there are no substantive reasons for BLM's nonsuitable recommendation given in the DEIS or WTS. Mineral, timber, livestock grazing, and ORV conflicts are all einimal or nonexistent.
68 Wilderness designation of Adobe Badlands would greatly enhance the diversity of the National Wilderness Preservation System by incorporating an area of Mancos Shale badlands. In the other instances in Colorado where BLM has had the opportunity to protect an example of such an ecosystem, most notably in McKenna Peak WSA and Little Bookcliffs WSA, BLM has similarly failed to act on behalf of
51 wilderness diversity. Is there any inherent reason why Mancos Shale badlands are unsuitable as wilderness that BLM has not told us?

COAL

The DEIS does not seem to offer much of a range in the alternatives for future coal leasing. With the exception of the current management alternative, all of the alternatives propose the same amount of acreage available for future leasing (+/- 500 acres). This seems particularly inappropriate since the RMP/DEIS notes at 1-9 that the
42 RMP-EIS process is when multiple-use trade-off determination is to be made. It is hard to believe that in the Conservation Alternative, for example, that development of coal outweighs other resources as often as it does in the production alternative. While BLM may have actual control over only the minerals on these lands, BLM cannot ignore the impact that coal development might have on wildlife, water quality, and other such resources offsite. The alternatives need to be revised to reflect this.

STORM KING PEAK SKI AREA SITE

The RMP/DEIS is completely inadequate with respect to its treatment of the proposed Store King Peak Ski Area. BLM falls all over itself trying to get of the way of eaking any sort of a decision about the most appropriate resource use of Store King Peak. BLM's self-direction in the RMP/DEIS (1-5) states that it should determine whether "developeent of Store King Peak Ski area would be compatible with wildlife habitat, timber production, and coal production." The decision in the proposed RMP comes nowhere near fulfilling this criterion. Instead, BLM offers up some silly scheme to allow development of the ski area for five years hence, after which BLM might change its mind and not allow development. What kind of
69 management guidance is that? The RMP is fairly specific about the impacts of the proposed ski area on wildlife, noting that the ski area would eliminate useable elk calving habitat and impact mule deer fawning (4-34). That seems a fairly clear stateeent concerning compatibility of the ski area with wildlife habitat. BLM should make a definite manageeent decision based on this inforeation, either in favor of the ski area or opposed to it. The Sierra Club urges BLM to oppose the ski area, and to reject it by finding it to be an incompatible use of Storm King Peak in the context of multiple-use resource trade-offs in the RMP. We wonder why BLM seems so intent on satisfying the ski area proponent since not a peep of support was offered at any of the public hearings for the proposed ski area, and since the proponents were not even interested enough in the proceedings to attend any of the hearings.

We would also subeit that if BLM insists on accomodating this phantom ski area proponent, then BLM should demand evidence of financial capability from the proponent.

On one final note, the RMP/DEIS has a significant oversight in falling
120 to include in the Preferred Alternative "Impacts on Terrestrial Wildlife Habitat from Recreation Management" (4-52) any mention of the impacts to elk and mule deer from development of the proposed Storm King Peak ski area.

RECREATON

We commend BLM for incorporating the excellent work that has already been done in developing the Gunnison Gorge Special Recreation Management Area into the proposed RMP (3-34). However, what is the rationale for revoking the mineral withdrawal for these same lands? We doubt that there is any great clamoring for exploration and
41 development of these lands, so why the revocation? Despite their low mineral potential, there still exists the possibility for claims to be staked and surface development to occur that would have an adverse

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November 3, 1987
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41 Impact on the dominant recreational values present. And how in the world can BLM claim that revoking the mineral withdrawal and opening these lands to the hackneyed approach of the 1872 Mining Law enhances "long-term land use planning"? That's got to be double-speak if anything is! Leaving the Gunnison Gorge SRMA closed to mineral development is as certain a form of long-term land use planning as one could devise.

The Sierra Club supports BLM's recognition of the growing demand for river recreation through its proposal to enhance river access for the lower Gunnison River at Escalante Bridge and to provide informational materials on river use (RMP/DEIS at 3-32).

LAND DISPOSAL

The Sierra Club finds the stated criterion for assessing the potential for disposal of public lands (RMP/DEIS at 1-6) greatly lacking in their protection of the public interest. The approach taken by the Grand Junction Resource Area in the Grand Junction RMP, listing 17 criteria that would automatically warrant retention of tracts of public land, provides far greater protection for public interests. The Uncompahgre Basin RMP should adopt a similar set of criteria.

Several of the tracts identified for potential disposal do not meet the criteria for disposal as stated in the RMP/DEIS. One such tract is the public land along West Dallas Creek (T.44N.,R.9W., sections 4 & 9). This tract possess significant public values in the form of 85 riparian habitat and recreational opportunities. It is located on a county road that provides access to the Mt. Sneffels wilderness, and it provides for public camping areas in a valley that is almost entirely otherwise controlled by private interests. We do not see any circumstances under which this tract should be passed out of public ownership.

Two other tracts include the former Baldy Peak WSA (T.45N.,R.8W., section 36) and a tract along Cow Creek (T.45N.,R.7W., sections 9 and 16). Both of these should only be disposed of if passed on to the U.S. Forest Service. Baldy Peak represents a potential addition to the existing Big Blue Wilderness, while the Cow Creek tract offers public access to the creek amidst one of the most scenic and popular locales in the Uncompahgre Mountains.

RIPARIAN HABITAT

The Sierra Club supports BLM's recognition of the importance of riparian zones through its development of the "O-9" management prescription in the preferred alternative.

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TRANSPORTATION

We support BLM's proposed closure of the Potter Creek road and the Dry Fork of Escalante Creek road (RMP/DEIS at 3-38). There are far too many roads on the Uncompahgre Plateau at present. Closure of these should enhance wildlife habitat as well as provide for greater priritive recreation opportunities.

The RMP/DEIS should incorporate an analysis of the impacts of blanket RS2477 Right-of-Way grants to Delta and Montrose counties. The RMP is the appropriate document for evaluation of the transportation needs of the Resource Area, and since RS2477 grants are a significant component 84 of access to and through public lands, they should be included in the RMP. Any grants given to the counties should be limited to the width of the actual use at the time of the enactment of FLPMA in 1976. BLM might also be aware of the fact that its procedure for allocation of RS2477 grants is currently under litigation in federal court in two states, Alaska and Utah.

We appreciate the opportunity to comment on the proposed RMP and DEIS, and look forward to your consideration of these comments.

Sincerely,

Mark Pearson

Mark Pearson
Chair, Rocky Mountain Chapter, Sierra Club
P.O. Box 2064
Grand Junction, CO 81502

COLORADO NATIVE PLANT SOCIETY
P.O. BOX 200 • FORT COLLINS, COLORADO 80522

November 1, 1987

Mr. Robert Vecchie, RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchie,

The Colorado Native Plant Society submits the following comments on the Draft Uncompahgre Basin Resource Management Plan and EIS. We have conducted a number of field trips in the Resource Area, and are aware of the important botanical resources present.

Each of our reviewers commented, independently, on the difficulty of reviewing this document because of its format. Information is so badly scattered, with frequent inconsistencies, that comparison among alternatives is difficult. This plus inadequate delineation of Management Units on the very poor maps makes it nearly impossible to evaluate recommendations for a given area. We also note that the lapsed statements (Chapter Four) are written to present primarily favorable aspects, and negative impacts are minimized or (mostly) ignored. Table 4-1, a subjective "summation of alternative impacts," is absurd. The draft RMP should be thoroughly revised and reissued as a second draft, with additional opportunity for comment provided.

We appreciate the RMP's recognition of the threatened, endangered, candidate, and BLM-sensitive plant species present in the Resource Area. The special vegetation resources of Escalante Canyon also are acknowledged, but no recognition or consideration is given to state-sensitive plants or remnant plant communities elsewhere in the Resource Area. This omission should be rectified by consultation with the state Natural Areas Program. The draft RMP is seriously deficient in this respect, inasmuch as the 103 existence of such resources should affect proposed management in several Management Units, and may warrant designation of additional Special Management Areas.

Because of its significance as habitat for a number of these valuable plant resources, it is vital that sizeable areas of ecbe badlands be maintained in essentially undisturbed condition. It is simply unacceptable that the Preferred Alternative proposes to allow ORV use that "...would reduce potential habitat of threatened and endangered species and unique plant associations" (p. 4-43), and is admitted to cause "...a loss of 10,000 acres of potential habitat for the Gothic Basin hookless cactus and Dolte lomatium" (p.4-52). We fail to see how this plan can be reconciled with the 27 Endangered Species Act's provisions requiring you to protect listed plants.

Mr. Vecchie
-page 2-

27 The final RMP must be changed to omit the proposed North Delte ORV use area, development of which will destroy many such plants.

The impact of ORV use on Mancos shales is undeniable; such use must be prohibited, not merely restricted, in additional areas. Closure of only 6% of the Resource Area to ORVs is insufficient. Additional closures would benefit not only plant resources, but would reduce the adverse impacts that 67 the proposed levels of ORV use admittedly will have on air quality (page 4-44), soils (4-48), water resources (4-50), riparian zones (4-50), T and E species (4-51), wildlife habitat (negative impacts of open ORV use not listed, p. 4-52 and 4-54), livestock grazing (4-54), cultural resources (4-57), and visual resources (4-58).

The limited but highly significant riparian vegetation of the Resource Area 116 receives insufficient attention in the Draft RMP. The final plan should more clearly identify this important habitat, and spell out management tools that will be employed to restore and maintain it. The very small acreage involved inconsistently described as 1,034 acres (Table 2-3, page 2-61 24 6,320 acres (page 4-54); 11,455 acres (6,320 + 5,125, page 4-51)] and the importance of this component of the ecosystem warrant total exclusion of grazing. Seasonal limitations, partial AUM reductions, or forage 119 utilization limits on grazing are not sufficient for restoration or continued existence of quality riparian areas.

We support designation of the Escalante Canyon ACEC, the Fairview RNA, and the Needle Rock ACEC/ONA, but management plans for these areas are not specified in sufficient detail. Management Unit 9-12, the Escalante Canyon ACEC, should be enlarged to encompass additional lands along Escalante Creek. This area requires restrictions on livestock grazing to prevent 28 damage to the federally listed and other unique botanical resources. Other management provisions should be listed in specific detail for each site.

In addition to our support of recommendation of the Gunnison Gorge WSA, we also ask that Adobe Badlands and Camel Back be recommended as suitable for wilderness designation. We find absolutely no justification in the draft RMP for exclusion of the latter two areas. The DRMP clearly states that their exclusion "...would prevent the permanent protection of existing 68 wilderness values, including pristine environments and outstanding 136 opportunities for primitive and unconfined recreation" (page 4-58); why, then, are these "existing wilderness values" not to be recommended for wilderness protection? Please reconsider, and include both Adobe Badlands and Camel Back as recommended for wilderness status.

We also ask that the statement of intent to require measures to protect threatened and endangered species in land use activity plans (page 3-2) be 135 amplified to clarify that this intent also includes BLM-sensitive and state-sensitive plant species and plant associations.

Mr. Vecchia
-page 3-

Finally, we strenuously oppose disposal of any public lands on which federally listed or candidate plant species occur (page 4-52). The final RMP should state unequivocally that a thorough survey for such plants will be made on any parcel proposed for disposal, and that no disposal of land containing listed or candidate plants will occur. It is vital that these sites remain public property.

100

Thank you for the opportunity to review and comment on the Draft RMP. We would be glad to cooperate in any possible way to perpetuate the unique botanical values of the Uncompahgra Resource Area, which we consider a very special part of Colorado.

Sincerely yours,

Susan S. Martin

Susan S. Martin
Conservation Committee Chair

November 4, 1987

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

The National Parks and Conservation Association appreciates the opportunity to submit comments on the Uncompahgre Basin Resource Management Plan. NPCA is a national, nonprofit organization devoted to the protection of national parks and related resources with about 55,000 members nationwide.

Wilderness

We support BLM's recommendation to recommend all 21,035 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Without question, the Gunnison Gorge is one of the premier candidate wilderness areas in the state of Colorado. We commend BLM for its all wilderness recommendation for the Gunnison Gorge.

We recommend that BLM recommend the Adobe Badlands for wilderness. Your documents provide no compelling rationale why this area should not be recommended for wilderness designation. Resource conflicts appear to be minimal, especially since BLM states in the plan that it intends to prohibit off road vehicle use in the area. Designation of the Adobe Badlands would add to the area's protected wilderness and recreational opportunities. We encourage BLM to reevaluate its recommendation for the Adobe Badlands WSA.

68

We also encourage the BLM to recommend Camel Back WSA for wilderness designation. Camel Back is one of a limited number of undisturbed areas still existing on the Uncompahgre Plateau. From our review of BLM documents, we perceive no resource conflicts with wilderness designation of this area. Rather, the area's scenic, recreational and wildlife values make it a deserving area for wilderness designation. We urge BLM to reconsider its no-wilderness recommendation for Camel Back.

136

National Parks and Conservation Association
1015 Thirty-First Street, N.W., Washington, D.C. 20007
Telephone (202) 944-8530

Areas of Critical Concern

The Federal Land Policy and Management Act (FLPMA) requires BLM to "give priority to the designation of Areas of Critical Environmental Concern." FLPMA defines ACECs as "areas within the public lands where special management attention is required . . . to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes . . ."

101

BLM fails to comply with FLPMA's requirements regarding ACECs in the Uncompahgre Resource Management Plan. While the Conservation Alternative and Preferred Alternative recommend designation one relatively small ACEC, the Plan fails to provide any analysis of other potential ACEC candidate areas. This failure leaves NPCA with the impression that BLM didn't complete such an analysis. This is particularly true because other areas exist in the Resource Area which include "important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes." Some examples include all or portions of the three WSAs and all or portions of the Gunnison Gorge Recreation Area. The BLM should include a more complete analysis of ACEC candidate areas in the Final Plan.

102

Oil and Gas

The BLM fails to provide adequate analysis of oil and gas issues in the draft RMP. In Conners v. Burford the court said, "comprehensive analysis of cumulative impacts of several oil and gas activities must be done before a single activity may proceed." A cumulative effects analysis is not provided.

47

We do support BLM's no leasing recommendation for the Gunnison Gorge, but recommend that it be expanded to include the entire Gunnison Gorge Recreation Area.

59

Disposal of Lands

BLM identifies several areas for disposal with high recreational values and use, including the Muddy Creek tracts above the Paonia Reservoir, lands on Baldy Peak and the West Dallas Creek tract. We encourage the BLM to revise its criteria for identification of disposal lands to rule out high recreation value or use area. Similarly, lands with wilderness values, historic values, cultural resources or values, wildlife resources or values should not be identified for disposal.

85

Red Canyon

We encourage the BLM to identify the acquisition of land in Red Canyon to provide for a more logical and ecologically sound boundery for the proposed Gunnison Gorge.

63

ORV Use

In order to adequately protect public land resources and meet its stewardship responsibility, BLM should limit vehicles to existing roads, except in limited "closed" and "open" areas. Areas open to off-road vehicle travel are clearly sacrifice areas. Vegetation, soils, wildlife habitat, and scenic values and unavoidably harmed. In fact the Plan admits that ORV use will have substantial adverse impact on soils, water, and vegetation. We encourage BLM to revise its ORV recommendations in the final RMP.

67

We appreciate your attention to our concerns. Please keep us informed of progress on the Plan.

Sincerely,

Terri Martin

Terri Martin
Rocky Mountain Regional Representative
National Parks And Conservation Association
PO Box 1063, Salt Lake City, Utah 84110
801-532-4766

Far Flung Adventures
Box 168 · Ouray, Colorado 81427 · (303) 325-4540

Bureau Of Land Management
Uncompahgre Resource Area
Attn: Jon Searing And Staff

Dear Jon,

After reading the first draft of the Resource Area Management Plan concerning the Gunnison Gorge, there are several points I feel should be reconsidered.

We offer a safe, "resource aware" section to our customers as do other outfitters on the gorge. I feel very strongly about protecting the gorge and have written numerous letters endorsing "Wilderness and Wild And Scenic Designation". below are the points that need to be re-examined:

68 136 1. In your Uncompahgre Basin Resource Management Plan and Environmental Impact Statement "Preferred Alternative" Draft One,the BLM recommends that the Gunnison Gorge be designated "Wilderness Area".I support this recommendation 100%, but I want Camel Back Mtn and Adobe Badlands WSA included in the BLM recommendation to be designated "Wilderness Area". These two areas are ecologically unique and delicate to this area. Please make an environmentally progressive and wise decision for other federal agencies to follow. Recommend that Camel Back and Adobe Badlands are suitable for "Wilderness Designation".

2. I support, through whatever channels are necessry,for BLM staff in the field to have more power of enforcement, in order for private and commercial users to better adhere to BLM regulations.

3. I feel the BLM is making a regretable mistake by not automatically making fire-pans and porta-potty systems mandatory for all overnight horsepack and river trips.

During the '87 season I noticed a marked increase in human waste in camping areas and numerous ground fire-rings. I would yes firepans and porta-potties whether they were mandatory or not, but unfortunatly that isn't the prevailing attitude among some private users. Make firepans and porta-potties mandatory!

4. Private and commercial launches should be split 30-30. That is 3 private launches and 3 commercial launches. Private boaters have every right to float a section on their own, provided they do so in a "low impact" method.

Commercial boaters equally have the right to launch availability. Commercial outfitters, provided they operate "resource aware and responsible" trips provide a viable safe and low impact service. For customers who want and have a right to experience the 12 Gorge Area on a primitive,pristine level, outfitters provide the means. These outfitters provide a needed boost to many Western Colorado communities by bringing much needed tourism dollars to west slope areas.

5. Include the season of '87 in consideration of this final draft towards your allocation plan for the Gunnison Gorge season of 1988. As I wrote to you in a previous letter concerning just this matter, '87 was our first season as the true corporation.

25

Far Flung Adventures
Box 168 · Ouray, Colorado 81427 · (303) 325-4540

12 of Far Flung Adventures. We made a substancial investment in operating a business on the Gunnison Gorge, above and beyond Bureau Of Land Managements regulations and stipulations for commercial outfitters. I'm speaking for other outfitters as well in this matter.

6. Trying to regulate use on the Gunnison Gorge by lengthening the hike from a parking area to the put-in on the river by a mile, or closing the trail to horsepacking is only "treating the symptom". A permit system for boaters is a viable method to regulate over-use on the gorge.

We are anxious to work together with you on a management plan that can strike a balance between commercial/private use and maintain the integrity of this marvelous section of river.

Yours for the river,

Trudy Bischill

Putting People and Rivers Together

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I (do) (~~do not~~) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
68 No Wilderness Alternative. This Alternative best exemplifies the multiple-use management.
136 Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed:

Sharon Mock
Richards & Richards
Tucka, Colo 81434

Date: 10-15-87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance
86 livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed:

Sharon Mock
Richards & Richards
Tucka, Colo 81434

28

Campbell Cattle Co
1324 25 Mesa Rd
Delta Colorado 81416

Date: November 2, 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

As cattle producers - we know that our industry has had several bad years and that if we are to continue raising beef that we need to work with the BLM and Forest Service to keep up the numbers of cattle and be able to prudently graze our public lands.

Any wilderness will affect the senior citizens who cannot walk or ride horseback into
66 these areas, but like here and enjoy a day or
68 a weekend during these. The people who use
136 wood for heating, the recreationists and we Cattlemen would like to keep these areas as they are! We would like to see these areas used, to continue to be used by [illegible] of future generations.

Signed: [illegible]

Helen A. Campbell
for Campbell Cattle Co.

29

COLORADO WESTMORELAND INC.

P.O. Box 1299 Paonia, Colorado 81428 □ 303-527-4135

November 2, 1987

Mr. Robert E. Vecchia, RMP Team Leader
Bureau of Land Management
Uncompahgre Resource Area
2505 South Townsend Avenue
Montrose, CO 81401

RE: COMMENTS ON DRAFT UNCOMPAHGRE BASIN RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Vecchia:

Colorado Westmoreland Inc. (CWI) supports the continuation of the 26 existing coal leases as proposed in each of the four alternatives presented in the Bureau of Land Management's Draft Uncompahgre Basin Resource Management Plan & Environmental Impact Statement. As CWI currently holds four federal coal leases, continuation of these existing leases is critical to CWI's ongoing operation.

Though local coal industries are presently suffering in depressed markets, in the long-term, coal markets are projected to improve. CWI also supports the identification of additional acreages of federal coal estate within the Uncompahgre Basin for future coal leasing as proposed in the "Production Alternative" and "Preferred Alternative".

CWI appreciates this opportunity to comment on the Draft Uncompahgre Basin Resource Management Plan & Environmental Impact Statement. Please feel free to contact me should you have questions.

Sincerely,

COLORADO WESTMORELAND INC.

Kathleen G. Welt

Kathleen G. Welt
Environmental Specialist

KGW:fec

SUBSIDIARY OF WESTMORELAND COAL COMPANY

30

MUSSER RANCHES

701 650 Escalante
Delta, Colorado 81416

Telephone: (303) 874-7372

October 30, 1987

Robert E. Vecchia, RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue,
Montrose, CO 81401

Dear Mr. Vecchia:

The Draft Uncompahgre Basin Management Plan/Environmental Impact Statement attests to many man hours of research and assimilation of materials. It is very apparent that this study has been imposed by persons or groups who are not really familiar with the work that has been done by the BLM or the [illegible] of the [illegible] land over the last half century. These same people are not open minded to present research methods of range improvement. Our family, for over a century, has been a user of part of the area that this study encompasses, and, in fact, they were instrumental in helping set up the BLM. The area with which we are best acquainted has improved a hundred fold since the BLM was implemented, and we feel it would be an injustice to change many of the present management techniques that are showing great improvements, not only in grazing conditions, but raparian habitat, wildlife habitat, and recreation.

The following are some of our comments on the Uncompahgre Basin Draft RMP/EIS.

113 CURRENT MANAGEMENT IMPACTS page 4-7 Impacts from Livestock Grazing Management---3rd sentence: "-----aquatic habitat would be maintained at less than optimum conditions or would deteriorate over the long-term due to trampling and excessive livestock utilization of streambank vegetation." In area A-2 there is little if any evidence to prove this statement. Under present management, stream banks, as well as all areas not adjacent to streams have improved considerably. Livestock grazing conditions are improving, wild life habitat is improving, riparian habitat is improving and I would recomment continuation of the present management plan with cooperation between DOW, ranchers, and the BLM working together to further improve conditions.

MANAGEMENT UNIT D-18 page 3-27 CONSERVATION ALTERNATIVE and
MANAGEMENT UNIT D-4 page 3-20 " " Livestock Grazing
"Livestock movements would be restricted, if necessary, to reduce trailing and surface disturbance in riparian zones. Livestock use would be limited to 55 percent utilization by weight of key forage species and eliminated from March 1 through May 31."

Through Holistic Resource Management, it has been proven that livestock grazing throughout the year improves riparien habitat. Willows that are grazed in the spring flourish and grow more vigorously than those that are not spring grazed. We have evidenced this on our private land. For a more stable habitat, a variety of grazers is beneficial. Livestock tend to graze grasses more than do game animals. When grasses are not grazed sufficiently, the old grass smothers the plant roots and the plents eventually die out. Brush then takes over, brush alone cannot hold the stream banks as well as grasses, and more erosion takes place.

This is very evident along the lower Escalante Creek in an area that has had little or no livestock grazing for the past 50 years. Stream banks are perpendicular and adjacent areas that once were small meadow type lands are now covered with brush that is too thick to be used by game animals. Instead they feed extensively in nearby irrigated pastures.

In the Little Dominguez Canyon, while it was grazed moderately, wild life found refuge and was abundant. During the past few years the canyon has had little or no use by livestock. The brush has become so entangled it is almost impossible for the recreationists to get through this creek and there is little evidence of any wildlife even though it is used by neither livestock nor recreationists.

Ranchers in the upper Escalante (Unit D-13) use the BLM very lightly, but for economic reasons it is vital that there be no restrictions on trailing of livestock between these ranches--ranches that provide a great deal more excellent riparian habitat than does the BLM--ranches that are used heavily by both deer and elk as well as livestock.

121 Note: "---limited to 55 percent utilization by weight of key forage species" This phrase appears frequently throughout the RMP/EIS. How can 55 percent be determined when inadequate records, or no records, have been kept to show what one hundred percent is. What does this mean? Does this mean 55 per-
133 cent of the vegetation that was in the area fifty years ago, five years ago, or before the start of the grazing season? Who is going to know what 100 percent was. To implement many of the ideas set forth in the RMP, huge amounts of money will have to be allocated for monitoring and policing. These ideas certainly are not in keeping with reduction of government spending.

26 MANAGEMENT UNIT D-12 PREFERRED ALTERNATIVE page 3-40
"The management unit would be designated as the Escalante Canyon Area of Critical Environmental Concern (ACEC). Livestock grazing is not mentioned.
MANAGEMENT UNIT D-2 CONSERVATION ALTERNATIVE page 3-1[illegible] 2nd paragraph "The management unit would be designated as the Escalante Canyon Research Natural Area (RNA)." This is the same area as designated ACEC in Preferred Alternative. Under Livestock Grazing: "Livestock grazing would be eliminated [illegible]

106 [illegible] livestock grazing in order to protect the listed plant species and unique plant associations is absurd. The unique plant associations are all located in rims that are completely inaccessible to livestock or even to wildlife. Private lands adjacent to the (RNA) have been intensely grazed for nearly a century. However, there are hillsides where the Grand Junction milkvetch is constantly increasing to the point of its over crowding other forbs and grasses. Apparently livestock and wildlife find the plant unpalatable, or undesirable, but their trampling, as with so many plant, help to propagate the species. There is data indicating that livestock do not graze any of the listed plant species. This is further illustrated by the fact that, before the implementation of the BLM, the area was a natural drift for untold numbers of livestock and therefore was extremely overgrazed.

Under present management, vegetation, including many species of native grasses and forbs, has been improved considerably. It is very evident, since the listed plant species are present in this area, they have either held their own or possibly have evolved under present conditions.

67 At the same time, it is very evident that ORV use will have to be curtailed as there are several areas that have been denuded by ORV use and human trampling.

132 In order for the ranches in the area to be efficient, livestock need to have at least a drift through this BIA. If ranches are not efficient, they will be sold for uses other than ranching. This will cut down on forage available to the wildlife, and the increased use of the area for recreationists will cause further deterioration of the environment. In this canyon, wildlife is very much dependent on the irrigated ranches not only for food, but for the privacy that is necessary to sustain wildlife.

114 The management of each allotment should be considered on an individual basis. For example, the riparian habitat (3-9 Preferred Alternative) does not have the same qualities or problems at elevations above 7000 feet in some of the areas that occur below 5000 feet elevation in other areas.

If ranchers are forced to curtail their grazing use on the BLM, many of them will be forced out of their livestock operations. While this is exactly what many of the wolf-in environmentalists are pushing for, if the livestock operators are forced out of business, there will be deterioration of the ranges even for wildlife because livestock is an important and compatible part of the ecosystem. Contrary to popular opinion, 80% of the wildlife in the United States, outside of Alaska, is very dependent upon private land. Our public lands lack a vital supply of food, water, and the privacy needed for a desired wildlife population.

For continued improvement of range quality, we strongly urge the CONTINUATION OF THE PRESENT MANAGEMENT PLAN with emphasis on cooperation and understanding between the affected parties--whether the areas of concern are air quality, grazing, wildlife habitat, or mining etc. Thank you for the opportunity to reply to the Draft BOR/BIA.

Sincerely,

for John A. Mercer
Member Ranches

Colorado-Ute Electric Association, Inc.
P.O. Box 1149
Montrose, Colorado 81402
(303) 249-4921

November 4, 1987

Robert E. Vecchia
RMP Team Leader
United States Department of the Interior
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

Draft Uncompahgre Basin Resource Management Plan

Colorado-Ute Electric Association, Inc. is an electric generation and transmission cooperative headquartered in Montrose, Colorado. It operates on a non-profit basis and provides wholesale electric service on an "all-requirements" basis to 14 retail electric distribution cooperative members who serve 191,000 customers in parts or all of 48 of the state's 63 counties. Colorado-Ute owns electrical facilities, land and water rights in and near the BLM managed lands covered by the current draft Resource Management Plan. Colorado-Ute submits the following comments concerning the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement.

Gunnison Gorge Wilderness Study Area (WSA)

71 The impact to Colorado-Ute of wilderness designation for the Gunnison Gorge WSA would not be negligible as has been stated on page 4-12 of the Wilderness Technical Supplement (WTS). The conditional water decrees (72,000 acre feet of conditional water rights) that Colorado-Ute owns on the Gunnison River are very valuable property rights. These decrees are senior to the entire Curecanti Project, including Blue Mesa Reservoir and are valued up to $7 million. If the Gunnison Gorge WSA is designated wilderness, the full potential value of Colorado-Ute's water rights could not be realized. The Tri-County Reservoir right is decreed for three separate locations. The value of the original location, just

61 downstream of the confluence with the North Fork, would be virtually eliminated. Two newer decreed locations further downstream would be restricted so that the full amount of decreed storage could not be realized.

Mr. Vecchia -2- November 4, 1987

The WTS also incorrectly describes the benefits and alternatives to Colorado-Ute's project. A reservoir constructed on the Gunnison River would provide Colorado-Ute benefits in addition to more generating capacity, which cannot be replaced by constructing coal-fired generation, as suggested on page 4-12 of the WTS. The

71 operational flexibility of hydroelectric generation offers power system peaking and regulation benefits that cannot be obtained from coal-fired generation. In addition, a reservoir would provide a water supply for a downstream coal-fired generating station.

It has been the consensus of the advisory committee studying the possible designation of a Black Canyon National Park and Scenic Recreation Area that the loss of that use of the water rights owned by Colorado-Ute and the City of Delta, and Colorado-

61 Ute's associated hydroelectric project, should be mitigated. The final Uncompahgre Basin RMP and EIS should address how Colorado-Ute and others with development rights to be impacted, will be compensated for the water right development potential that would be lost as a result of wilderness designation.

Colorado-Ute also has concerns resulting from the effect the Gunnison Gorge being designated as a wilderness area has on area economic development opportunities. One ramification is that once it is designated wilderness, there are those who would strive to have the area classified as a Class I area under the Clean

58 Air Act. Such designation would severely restrict economic development opportunities for communities in the North Fork and Uncompahgre Valleys. This would be an unfortunate spin-off from a wilderness designation, where as, if the area were not designated wilderness, it could be managed to protect its scenic and other valued resources, and economic development opportunities would not be lost to communities in the surrounding area.

Management Unit D-7

30 Colorado-Ute disagrees with the proposed management of major utilities in management unit D-7. A large geographic area (50,854 acres) is proposed to be closed to utility development to reduce conflicts between utilities and potential surface effects of coal mine subsidence. Colorado-Ute believes this action is unnecessary since the existing mines in the area are room and pillar operations which typically cause little surface subsidence. If a transmission line were needed in this management unit, any potential subsidence problems could be addressed in the BLM permitting

Mr. Vecchia -3- November 4, 1987

30 process. We are also concerned about the potential public opposition, due to visual concerns, in routing a line in the proposed 0.5 mile wide corridor centered on Colorado Highway 133. The RMP should be flexible enough to allow consideration of other potential corridors during scoping and permitting of any future lines in that area.

General Comments

95 The analysis of the impacts of major utility development in the RMP appears to have been heavily influenced by the 1980 Western Regional Corridor Study. This study is over seven years old and is only a planning tool. Projects requiring electric service either on a local or regional level can develop or change rapidly. We do not agree with your assumption on page 4-58 "Closure or restrictions on lands not identified as being needed (in 1980 Western Regional Corridor Study) for utility facilities would be assumed to have e negligible impact on local and regional major utility development". The need for and predictibility of utility development is much more dynamic than has been portrayed.

115 Colorado-Ute does not believe it is necessery or appropriate to prohibit siting transmission lines in riparian zones (See p. 4-51). In many of the narrow canyons in the area it would be possible to span the riparian zone or just trim the vegetation that would interfere with conductor clearance.

112 Colorado-Ute does not believe utilities and their associated access are currently stressing or would stress wildlife in the North Fork area (See p. 4-53 Impacts on Terrestrial Wildlife Habitat). The benefits of confining utility facilities to existing corridors along major roads have been overstated. If necessary, gates or barriers can be used to restrict access to protect wildlife, and can be addressed as BLM permit conditions, when appropriate.

Thank you for this opportunity to comment on the Draft Uncompahgre Basin Resource Management Plan. Please contact me if you have questions concerning these comments.

Very truly yours,

Jerry A. Walker

Jerry A. Walker, Manager
Environmental Services

JAW/MARsjr

32

Chevron

Chevron U.S.A. Inc.
6400 South Fiddler's Green Circle, Englewood, CO 80111, P.O. Box 599, Denver, CO 80201

Lisa Fleische Mercier
Staff Analyst
Legislative and Regulatory Affairs

November 5, 1987

Draft EIS and Resource Management Plan
Uncompahgre Basin Resource Area

Mr. Robert Vecchia, RMP Team Leader
Uncompahgre Basin Resource Area
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

Pursuant to my phone conversation with you last week, please accept my comments on your draft EIS and RMP, even though you will have received them after November 5. As you recall, I had phoned your office for ten days and was not able to get through due to your phone number having been changed. On October 26, I finally wrote you a letter requesting a copy of the draft. In a subsequent phone conversation, you said that you would accept my comments as long as they were postmarked by November 5.

Chevron commends your RMP team for preparing such a clean, understandable document. We believe that your decisions are justified and presented in a logical concise manner.

We also support your preferred alternative. Under that alternative, your use of oil and gas stipulations seem reasonable, equitable, and unbiased.

8 However, Chevron does have one suggestion that we believe would make your document more defensible. Possibly the appropriate place would be in Chapter 5, "Consultation and Coordination." We believe that it is important that the public be informed with a general description of the process involved when oil and gas activities are conducted on public lands. Specifically, it seems that it would be important to emphasize that the public will have future opportunities to comment on proposed oil and gas activities, and to give them a general idea of the procedures and regulations that industry and the BLM must comply with before we can lease or engage in exploratory or production activities.

Thank you for your consideration of these comments.

Sincerely,

Lisa Mercier

LFM:js

Northern Region – Exploration, Land and Production

33

JERRY D. JACKA
P. O. BOX 5042 · PHOENIX, ARIZONA 85082 · TELEPHONE (602) 944-2782

August 7, 1987

John Davis
U.S. DEPARTMENT OF INTERIOR
Bureau of Land Management
Montrose District Office
2465 South Townsend
Montrose, CO 81401

Dear Mr. Davis:

Thank you for sending copies of the June 87 drafts of the Uncompahgre Basin Resource Management plan.

I am interested in purchasing certain parcels of land should they become available. The parcel of most interest is that described by Ouray County as Parcel #25, Map 4517. This is an 80 acre parcel in the east half of the southeast quarter of Section 14. However, I am interested in any property in the general area that may become available. I have attached a copy of your Preferrred Alternative Map and have highlighted in yellow the parcels of interest.

I am interested in cash purchase or have ten acres in Yankee Boy Basin and forty acres north of Silverton, both in National Forests, which are available to trade.

I would appreciate it very much if you would advise me as soon as possible if any of the property becomes available for public acquisition.

Sincerely,

Jerry D. Jacka

The attachment is available for review at the BLM office.

34

P.O. Box 7291
Boulder, CO 80306
9/13/87

Dear Mr. Vecchia -

I have spent time hiking and kayaking in the Gunnison Gorge and strongly urge that it be designated a wilderness area. I also
70 support, strongly, the elimination of grazing and
96 the introduction of bighorn sheep in the
67 badlands areas. I would like to see all ORV use stopped.

Sincerely,
Kate Palmer

35

DR. AND MRS. FRANK DENNEHY
5040A E 1/2 RD.
GRAND JUNCTION, COL. 81548
(303) 434-4878

September 14, 1987

Dear Mr. Vecchia,

My wife and I are residents of Grand Junction. We frequently enjoy Western Colorado's outdoor offerings. And, being former Easterners, we are watching very closely the development of Western Colorado. We have seen the tragic results of over-development. I am writing to you regarding the Uncompahgre Basin Resource Management Plan. I would like to ask you to do what you can to change the Plan as it is proposed concerning the Camel Back area. I highly value the Uncompahgre Plateau as one of the last "undiscovered" beauty spots of the Western Slope. The fact that none of it is designated wilderness is pitiful. Please reconsider Camel Back as
136 a designated wilderness area. The game herds on the Plateau need it; Western Colorado needs it; I need it.

Another area in the RMP I wish to comment on is the Gunnison Gorge Wilderness Study Area. I wish to thank BLM for designating these 21,000 acres as wilderness. These are prime wilderness acres, and are necessary for the Gunnison River area to continue as one of

Western Colorado's major fishing attractions. Again — thanks — it was a wise decision.

68 Lastly, what about the Adobe Badlands? Why not make it a wilderness area? What is the reasoning behind the decision not to make it wilderness. Of what other use is that land? If BLM is going to recommend an area for non-wilderness designation, an explanation must be presented in the recommendation.

Colorado has little to gain, and everything to lose, in developing its as-yet undeveloped lands. Try to enjoy a scenic vista in New Jersey. Try to go camping in Virginia (make a reservation well in advance, and be ready for the crowds). Try to find a patch of grass in New Hampshire that doesn't have a "no-trespassing" sign, or a store selling maple syrup, on it. The western states still have vast areas of relatively unruined land. Let's work to keep it that way.

Thank you for your time.

Sincerely,

Frank Bernardy

CHUCK SHEPARD 36
36995 HWY. 184
MANCOS, CO 81328
(303) 882-4743

Dear Gene,

I wish to go on record as supporting wilderness status for all areas under study by the BLM. I commend the BLM for recommending Gunnison Gorge for wilderness status. I am happy about that.

I fail to understand why we do not preserve as much as we can of the remaining wild parts of our public lands as wilderness as we can. I feel that far too much of our public lands have been developed or in one way or another trashed or mucked up. Now is a time we should restore + preserve. To do otherwise is short sighted as I am confident that we will grow to need + appreciate the unspoild wild parts of our country more in years to come. We can not create wilderness and even if we could the cost would no doubt be much higher than it would be to preserve what we now have.

One can also argue that if we now have a great need to use the natural resources in wilderness study areas, we will need it even more in the future. If we must use it, better to save it for later when the need may be much greater.

We seem all to anxious to make use of resources which are already a glut on the market or in oversupply. I'm sure it provides a few to profit at the expense of the country as a hole. The BLM

should take a position of preserving all it can + put it to the use that will benefit the entire country to the maximum rather than for the benifit of a few to make a profit.

We or at least some have grown rich in material things + poor in spiritual health. We need that wilderness to get away + restore our spirits. We have far too little of it now. There will be a need for it as wilderness even more if our population continue to expand.

I would like to have Camel Back and Adobe Badlands also recommended for wilderness status. Their value for wilderness seems to far outweigh their value for any other use. It seems like such a low price to pay for something which we may consider
68 of great value in the future. There are
136 other choices between development + wilderness which may not be as easy. I would hope that the BLM would shift to the side of ~~[illegible]~~ preserving the wild in any case where there may be any doubt. I see no reason why we should give up our wilderness unless we have an overwhelming reason to do otherwise.

We also have a lot of ski areas already. Some don't seem to be very prosperous. Before
69 we allow future development we should be certain that such a need exists + we are not just trashing up the land further.

Thanks, Gene,

Chuck Shepard.

CHUCK SHEPARD
36995 HWY. 184
MANCOS, CO 81328
(303) 882-4743

P.O. Box 36
Cedaredge, Co. 81413
Sept. 15, 1987

Mr. Gene Vecchia
B.L.M.
Montrose, Co.

Dear Sir:

As a Native son — born in Paonia — and an ardent conservationist, I want to sincerely express my appreciation for B.L.M's recommending the Gunnison Gorge Wilderness Study Area for Wilderness protection.

However, I cannot understand BLM's not recommending any of Roubideau Canyon-dubbed "Camel Back" in your study for wilderness
136 protection. The Uncompahgre Plateau is one of the few remaining areas in Western Colo., accessible to visitors and residents, alike.

In so far as the Adobe Badlands are concerned,
68 I see no point whatsoever in making that area into a wilderness area. There is a plan afoot to establish a Nat'l. Guard training base in that area — a far better use for it than declaring it a Wilderness area.

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However the Storm King Ski Area Site is an entirely different situation! Elk and deer in this State are being harried all too much without putting another ski area in our Mtn. habitat. I am a hunter and enjoy the sport - but it is a sport that even out of state residents can afford. Skiing, on the other hand is strictly a "Rich man's (and Woman's) sport. $35.00 charges per day for a Lift ticket is a very small part of his or her daily expenses. Housing, air fare and equipment mount up into thousands of dollars per person per week! The Wolf Creek Pass Ski Area is foundering for lack of financing. So it seems patently obvious that expansion of the ski "business" into an Elk calving grounds and a deer fawning area cannot be justified at Storm King nor any other such area.

Yours truly,

[signature]

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Sept. 17, 1987
Dear Mr. Vecchia:
I am asking that you support Wilderness in the following: 1) Camel Back - Roubideau Canyon 2) Adobe Badlands. Please manage Storm King Mtn for the elk & calving & not for development. Also thank you for your help in Gunnison Gorge. It is really up to you to help preserve Colorado & set a high standard of clean air, water, vistas, for our state to continue with tourism. Without these places of scenic value- in a high standard we would loose the tourism that is well established.
Sincerely,

Jan Hose
Box 4931
Aspen, Colo 81612
ph: 927-3448

39

87 Sep. 14

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

Thank you for recommending that the Gunnison Gorge Wilderness Study Area be given wilderness designation. This magnificent area, and the beautiful section of the Gunnison River that it contains, deserve full protection from development.

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However, I am dismayed that BLM has not made the same recommendation for the Camel Back and Adobe Badlands areas. These two regions both contain endangered species and striking desert that should receive the protection of the wilderness designation, and neither has a large potential for minerals or other extractable resources. Camel Back and Adobe Badlands thus have just as much reason to be given wilderness protection as has the Gunnison Gorge area.

I urge BLM to recommend Camel Back and Adobe Badlands for wilderness protection, in order to preserve these valuable regions.

Sincerely,

Kurt Johnson

Kurt Johnson
747 12th St.
Boulder, CO 80302

40

54959 Hickory Road
Olathe, Colorado 81425
September 18, 1987

To:
Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

From:
Dick Brown and family, Victor Read and Rex A. Read.

85

Subject: Proposed change in RMP, dated June, 1987.

We have reviewed the June, 1987 Uncompahgre Resource Management Plan draft and would like the Bureau of Land Management to give consideration to the following lands for disposal. The BLM land we are interested in acquiring is not identified for disposal except for one 40 acre parcel. By proposing the following land exchange for review in the URMP comment period, a later planning amendment can be prevented after the plan is completed. (See the attached maps). The value of the lands are approximately $75.00 to $100.00 per acre.

Lands offered by the Brown family:

T49N, R11 W NMPM
Sec. 19 NE¼ SW¼, S½ SW¼, NW¼ SE¼ -160 Acres
Sec. 30 SE¼ SW ¼ - 40 Acres
TOTALS _ 200 Acres

Lands selected by the Brown family:

T48N, R12W NMPM
Sec. 12 W½ NW¼ - 80 Acres
N½ SW¼ - 80 Acres

Sec. 14 NW¼ SE¼ - 40 Acres
TOTALS - 200 Acres

Lands offered by Victor and Rex Read:
T49N, R11W NMPM (The same for land selected)
Sec. 28 SW¼ NW¼ - 40 acres
N½ SW¼ - 80 acres

Sec. 29 NE¼ SE¼ - 40 acres
TOTALS - 160 Acres

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Lands selected by Victor and Rex Reed:

Sec. 21 W½ SW¼ - 80 acres
S½ NW¼ - 80 acres

TOTALS - 160 Acres

The advantages of this proposed land exchange are as follows:

1. " The management unit would be managed to improve vegetation conditions and forage availability for livestock grazing." (Chapter 3, Page 31, URMP).
2. "If they are available non-federal lands that would improve livestock management and increase crucial deer and elk winter range would be acquired through exchange only." (Chapter 3, Page 32, URMP).
3. "Identification of public lands that are suitable for disposal and public lands that should be retained in public ownership; also, identification of non-federal lands that would best serve the public needs if in public ownership." (Summary, Page 1, URMP).
4. "The BLM actively acquires legal access as needs and opportunities aries. All forms of access acquisitions are considered including negotiated easements, cooperative right-of-way agreements and exchanges." (Chapter 2, Page 24, URMP).
5. Boundaries will contain land in blocks for more efficient management.
6. Private inholdings would be acquired.
7. Exchange would give legal access to Cushman Mesa.
8. Mineral rights held on the private lands owned by Brown and Reed would be conveyed.

Conclusion: For the above reasons we believe the proposed land exchange would be in the public interest.

Respectfully submitted,

Attachments are available for review at the BLM office.

Jack T. Brown
Victor H. Reed

2

Thursday
Sept. 17, 1987

Dear Mr Vecchia:

I am writing to make a few comments on recent BLM recommendations.

First, I would like to thank the BLM for recommending that all 21,038 acres of the Gunnison Gorge Wilderness Area for wilderness protection. I have visited this area and am so happy to hear of your positive approach on this beautiful area.

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I would also like to encourage your department to recommend that Camel Back's entire 10,402 acres be also under wilderness protection as well as the Adobe Badlands.

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In closing, I would also like to urge the BLM to manage the Storm King mountain for elk and not for ski developers.

Please protect our beautiful wilderness and wildlife. They are too beautiful to destroy. Thank you for your time

World Wildlife Fund
1255 Twenty-Third Street, NW
Washington, DC 20037

This card was created solely for use by World Wildlife Fund members and supporters — people who care about wildlife. The person sending this card contributed to WWF's efforts to protect the world's endangered wildlife.

and consideration.
Michyle K. Whitaker
P.O. Box 673
Wheat Ridge, Co. 80034

Original Art by Eric Forlee

John Speza
P.O. BOX 2255
STEAMBOAT, CO
80477

Sept, 18, 1987

Mr. Gene Vecchia
BLM-RMP Team Leader,

69
I have worked and guided extensively in the Cimmaron Ridge area of the San Juan Mtns for many years.

The plan to allow a new ski area in that northern section is not a good idea.

In Steamboat we built a ski area on an Elk Calving ground and now the Elk have no where to go for calving in the winter except private farms, golf courses, Condos and cause general chaos by their presence.

The same thing will happen in your area if prime calving grounds and mule deer fawning area are destroyed to promote a new ski area.

The skier demand is not up to the 10% increase mandated by USFS to let new ski areas build. If you coordinate with the other Forest Service areas in Colorado, there is a rash of new proposed areas to meet the "increasing demand" which is not there.

Why let speculation overbuild Colorado again? Thus leaving Stagecoaches and a dozen other now planned ski area skeletons scattered over our once beautiful Mountains?

And to allow a 5-year grace period before deciding whether to allow it while you let the developers develope it, is too late. How can you stop it once its being built? Be realistic. Put it off now, there is no demand!

Sincerely, John Speza

43

Gene Vecchia
BLM
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

136 I am writing to ask BLM to be sure to include wilderness protection for the Camel Back area inasmuch as it is one of the most logical areas in the state to be so designated. With no real justification for timber or mineral development, with a beautiful pristine canyon, and encompassing part of the unusual Uncompahgre Plateau not already badly scarred, it seems to be one area which should have been selected for wilderness protection without even any controversy.

With the rapid disappearance of so many rare plant species and the fact that our state's wildlife herds are being further and further restricted in their habitat, I consider these additional reasons for your agency to reconsider the designation for Camel Back.

Thank you for recommending Gunnison Gorge; if anything, Camel Back is more worthy of wilderness protection.

Nina Johnson

Nina Johnson
747 12th
Boulder, CO 80302

... and I appreciate the hard job it must be to represent fairly all interests.

44

Paul E. Lappala
486 Mesa Verde
Carbondale, CO 81623

September 17, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

68 136 We are writing to you in support of the BLM decision to recommend the Gunnison Gorge for wilderness designation. We also want to go on record in support for the same recommendation in the cases of the Camel Back (Roubideau Canyon) and the Adobe Badlands areas. From what we have read, these areas seem to pose no problem in opposition to wilderness designation, so why not?

69 In addition, we favor the preservation of the Storm King area for deer and elk calving grounds rather than a ski area. At least let the public be heard before permitting the 5-year grace period now being suggested.

Sincerely yours,
Virginia D. Lappala
Paul E. Lappala

45

THE FARM

Sept 17-87

Gene Vecchia
RMP Team
BLM
2505 Townsend
Montrose Co,

Sir,

I liz letter in in reference to BLM recommendations for wilderness by your office. I encourage you to re-evaluate your positions.

136 ① Camel Back should be wilderness I cannot understand why an area with no resource conflicts is not recommended. Why was this done.

68 ②. Adobe Badlands - should be wilderness.

69 Gunnison Gorge should be protected in its entirety as you have recommended. Storm King Ski Area is a ridiculous proposal I urge BLM to eliminate any consideration of it.

Sincerely
Greg McKennis

46

Claire C. Poole, Psy.D.
Licensed Clinical Psychologist

1660 S. Albion
Suite 616
Denver, CO 80222

Telephone:
(303) 782-0252

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

9-18-87

Dear Mr. Vecchia:

62 Hurray! I am delighted to hear that the Gunnison Gorge WSA has been recommended for wilderness protection under the Wild and Scenic Rivers Act.

68 136 Let me urge you to reconsider your recommendation for the Camel Back and Adobe Badlands areas. Both areas have great potential for wilderness and very little potential for anything else. Once the wilderness qualities of the areas are compromised by drilling, mining, timbering and the rest there is no going back. Once lost they are lost forever. There is such little wild land left we cannot afford to let any opportunity for protection slip away. In fact, I believe the burden should be on establishing an overwhelmingly important non-wilderness use for the land rather than justifying wilderness status.

The value of unspoiled wilderness to future generations far outweighs any immediate economic gain. We must stop thinking only of ourselves. Please do not allow the WSA's to slip away, and do not allow development to begin on the Storm King Site. Your agency is fully capable of making a good, balanced decision on this area - don't be pushed into hasty, provisional approval that can have devastating impact.

69 Sincerely,
Claire Poole

47

John Spezia
Box 2255
Steamboat Springs
Colorado, 80477

Sept 16, 1987

Mr. Vecchia,

I am writing the BLM offices in reference to Uncompahgre Basin Resource Management plan recently drafted.

62 I applaud the BLM recommendation of some 21,000 acres for the Gunnison Gorge Wilderness Area. This recommendation combined with the Gunnison N.M. downstream and the wild + scenic river act protects this area well.

There are two adjoining areas, Camel Back and Adobe Badlands, totaling about 20,000 acres that should also be included in your RMP.

136 In the Camel Back area there is no resource conflict, timber or mineral sources and the BLM is cutting back grazing as well. The 800 foot canyon cut by Roubideau Creek through Colorado major geographical features, Uncompahgre Plateau, provides a pristine + wild experience. There are several endangered plant species and wild game Animals that exist in Camel Back. It should receive wilderness status. I see no reason why not... could you explain your position of non-wilderness designation.

68 The Adobe Badlands is in much the same situation. The area has no endangered cactus, dry oil wells, low mineral potential, no timber, closed to ORV and incredible views of the San Juans. Any non-wilderness designation?

Sincerely, John Spezia

48

Northwest Rivers Alliance
P.O. Box 3865 Steamboat Spgs. CO 80477

9/18/87

Dear Mr. Vecchia,

Having just visited your lovely area of Colorado by attending the 12th Annual Gunnison Water Conference,

68 136 I urge you to protect Roubideau canyon + the ~~the~~ adobe badlands for our children to visit with their

69 children. Your thinking on the 5-year grace period for the storm King Ski area sounds like a first of its kind. Is this management? In Routt Co we are fastly seeing dollars roll in from long term natural preservation + will continue to seek recognition for conservation. Please record my comments, I'm unable to travel to Montrose 9/29/87.

Sincerely,
Charla Palmer
member NW Rivers Alliance

49

17 Sept '87
Rt. 10, Stock Cr. Rd.
Knoxville, Tn 37920

Robert E. Vecchia, RMP Team Leader
BLM, Uncompahgre Basin R.L.
2505 S. Townsend
Montrose CO 81401

Dear Mr. Vecchia,

Please include this letter as part of the record on the Uncompahgre Basin RMP/EIS. In general I was impressed with the quality of your planning effort, although some of the statistics were maddeningly imprecise. For example, the remark that a specific action "would result in a less than 1% decrease in salinity in the Colorado River system" (paraphrased) is almost worthless. A 1% decrease in the entire river's load would be a major victory.

71 On the other hand, "less than 1%" could mean anything. Also on p 4-10 of the WTS is the prediction ~~that~~ of a "50 to 500% decrease in sediment" yields. Come on. A 500% decrease? Does that mean that stopping ORV use will actually extract sediment (produce up to minus 400%?) from the river?

In general I support the Conservation alternative and urge you to incorporate it. In particular the Gunnison Gorge should be protected at all costs. The ducks, peregrines (I saw one in the Gorge near the Ute trail crossing in about 1973), deer, elk, bighorns, and solitude seekers need a protected

136 river. Serious consideration to protected the Camel Back WSA is also warranted. Winter range like that won't be around a generation hence if you don't protect it.

Sincerely,
Gordon Redda

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615 Wagon Trail Drive
Grand Junction, CO 81503
September 21, 1987

Mr. Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

I have reviewed the BLM's Draft Uncompahgre Basin Resource Management Plan/Environmental Impact Statement (RMP/EIS) and have the following comments.

67 I have compared the existing management plan alternative of lands available to off road vehicle (ORV) use and the BLM's Preferred Alternative acreages of lands available for ORV. The Draft RMP/EIS says there are currently some 444,521 acres available for ORV use and only 21,038 acres closed to that use. In BLM's Preferred Alternative there would be only 261,589 acres open to ORV use, 29,821 closed and 135,396 acres subject to seasonable closures to ORV use. As a winter and summer user of public lands, this amounts to a significant reduction in public lands open to public use. Consequently, I am strongly opposed to a BLM plan and preferred alternative which further limits, controls and/or prevents the use of "public lands" for continued use by "the public."

6 Consequently, I feel it is extremely important to prepare a detailed map and listing of roads and/or areas which would be closed or partially closed to use by ORV's for review by the general public land's users. I am sure these folks will have some additional thoughts and comments on this issue.

I appreciate the chance to comment on this Draft plan.

An Interested Citizen,

Larry Abbott

Larry Abbott

51

9/20/87

Dear Sir,

I'm writing to you about your three desert wilderness
68 recommendations. As I understand you've dropped the Camelback
136 and Adobe Badlands. I sincerely hope that you would reconsider
since these areas have unique geological and biological values.

Every day the value of preserving these areas becomes more apparent. So please reconsider, future generations will thank you.

Sincerely yours,

W. Rodney McKinnon

W. Rodney McKinnon
78AAA County Rt
Montrose, Colorado
81401

52

20 Sep 87

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Subject: Uncompahgre Basin Resource Management Plan

Dear Mr. Vecchia:

I am completely supportive of your decision to recommend all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Several important reasons exist in support of Gunnison Gorge wilderness. The area buffers Gunnison National Monument. It contains 13 miles of a river which is now a gold medal trout fishery and someday will be a National Wild and Scenic River. The undeveloped, roadless lands of the Gunnison Gorge are themselves of great intrinsic value, more important than any other resources combined. It is vital that every last acre of Colorado wilderness be preserved.

Thus I am greatly disappointed about BLM's non-wilderness recommendations for Camel Back and Adobe Badlands. No resource conflicts exist with the Camel Back canyons. You know this. There are no timber or mineral conflicts, and planned cutbacks in grazing will protect the riparian of the perrenial Roubideau Creek. I have hiked this creek, and I attest to the great beauty and solitude of Camel Back. I have visited Adobe Badlands. Much of it is reminiscent of Petrified Forest National Monument in northern Arizona. It shows a low potential for minerals, and is devoid of timber. These places are wild, Mr. Vecchia, and I want BLM to reconsider. Please recommend the 10,402 acres of Camel Back and the 10,425 acres of Adobe Badlands as wilderness.
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I am just as disappointed in BLM's management position on Storm King Mountain. Why is it that, when there is a conflict between human economic expansion and large numbers of wild animals, the wild animals must go? I do not want a ski area anywhere near Storm King Mountain, and I object to BLM's five-year grace period in which the developers may proceed with the ski area. I want BLM to manage Storm King Mountain for elk. And mule deer. And high mountains. And green forests.
69

Thank you, once again, for the Gunnison Gorge

Tony Herter

Box 251112, Lakewood, CO 80226-1112

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20 Sep 87

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Subject: Uncompahgre Basin Resource Management Plan

Dear Mr. Vecchia:

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69

Thank you, once again, for the Gunnison Gorge.

John Czarnecki
820 Brentwood, Lakewood, CO 80215

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20 Sep 87

Mr. Gene Vecchi
RMP Team Leader
Bureau of Land Management
2606 S. Townsend Ave.
Montrose, CO 81401

Subject: Uncompahgre Basin Resource Management Plan

Dear Mr. Vecchia:

I am completely supportive of your decision to recommend all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Several important reasons exist in support of Gunnison Gorge wilderness. The area buffers Gunnison National Monument. It contains 13 miles of a river which is now a gold medal trout fishery and someday will be a National Wild and Scenic River. The undeveloped, roadless lands of the Gunnison Gorge are themselves of great intrinsic value, more important than any other resources combined. It is vital that every last acre of Colorado wilderness be preserved.

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Thank you, once again, for the Gunnison Gorge.

Richard Kilburn
3232 San Mateo NE St 33, Albuquerque, NM 87110

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P.O. Box 373

Cascade, CO 80809

9-20-87

Gene Vecchia, RMP Team Leader

Bureau of Land Management

2505 S. Townsend Ave.

Montrose, CO 81401

Dear Mr. Vecchia,

I was pleased to read that you have recommended the Gunnison Gorge area for wilderness designation; the more I see of the eastern Slope semi-desert, the more interesting it gets.

136 But don't let the large-scale things like Gunnison Gorge distract you from things of a more human scale, like Roubideau Canyon. There it is possible to cross the stream and explore all the interesting vines and formations, not just wonder what it would be like if you could get there. Given the apparent lack of conflicts with wilderness status, it is disappointing that the smaller jewels get overlooked.

If it is excessively difficult or expensive to remove wilderness, you should say so and try to get the funding for more than one area, not just give up and back off. Neither it is or not, my 10-year-old son would probably appreciate having the maximum number of unspoiled areas to visit when he is grown, and this is the last chance you'll have to save them. When he asks me about really quiet and natural places to go for a vacation that will probably be even more demanding times than these, I would hate to tell him that we didn't save enough, and they all got overused, and there aren't any left.

Sincerely,

William A. Costas

William A. Costas

56

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO. 81401

Dear Gene Vecchia:

I am writing this letter to comment on the BLM draft Uncompahgre Basin Resource Management Plan. First I would like to thank BLM for recommending all of the Gunnison Gorge Wilderness Study Area for wilderness protection. This parcel of land will be a great addition to the spectacular Black Canyon of the Gunnison National Monument.

68 Next I would like to encourage the BLM people to recommend the Camel
136 Back (Roubideau Canyon) and also the Adobe Badlands for wilderness designation. With so few unspoiled areas such as these remaining and with essentially no conflicts with wilderness designation, it makes sense to protect these unique untouched areas now before they are destroyed. Finally I would like to protest allowing development of the Storm King Ski Area Site. The BLM plan states that the elk calving grounds on the north end of Cimarron Ridge would be eliminated. I cannot understand why the ski developers want to destroy the land which is most critical to the long term survival of what I consider the most prestigious North American large mammal. If you have ever been in the high country and had the opportunity to watch several bull elk compete for a harem of cow elk and listened to the bulls bugle all night long then you gain an appreciation for these animals that can never be lost. Since the ski area developers can't be entrusted with choosing a site that will not destroy critical wildlife habitat somebody must do it for them and in this case BLM has the responsibility to prevent the misuse of land under its control. I understand that the BLM people are trying to make the best use of all lands and are doing a quite effective JOB, but in this case the wildlife, elk in particular should be given the proper protection. Why is it so difficult to tell the ski developers to find a more suitable area before the ski project gets so much momentum that it can't be stopped?

69 I thank you for taking the time to read my letter and since the Resource Management Plan is only in its rough draft stages I hope you will give some serious thought to making some additions and changes while they are feasible.

Sincerely,

Jon Tourville

Jon Tourville

57

September 23, 1987

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Sir:

I went to cast my vote against the development of 1,000 acres of BLM lands for a proposed ski area, such land being located on the north end of Cimarron Ridge.

I understand the Bureau of Land Management has stated the ski area would eliminate the elk calving habitat, as well as impact mule deer fawning areas--but in spite of this the Bureau has so far neither approved nor denied it, but instead has proposed a 5-year grace period in which the developers may proceed with the ski area, after which the Bureau might not allow them to develop. I believe this is a ridiculous approach to management--better should they assess the compatibility of resources, not give one a 5-year headstart over the other. Please manage Storm King Mountain for elk and not ski area developers.

69

Yours truly,

Loraine Lane

Mrs. Lorraine Lane

3505 W. 39th Ave
Denver CO 80211

58

CHRIS-CRAFT
INDUSTRIES, INC.

Saline, Kansas
September 24, 1987

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, COLorado 81401

Dear Mr. Vecchia:

This letter is in regard to Gunnison Gorge, Camel Back, Adobe Badlands and Storm King ski area site.

To begin, I would like to thank the Bureau of Land Management for its recomendation of Gunnison Gorge for wilderness protection. Its natural features and its proximity to Gunnison National Monument make it eminently suitable for full protection, and the action should please thousands of those who do and will visit this area.

68 However, I would also protest three other
136 decisionsrecently made by BLM. I understand that Camel Back and Adobe Badlands have not been recommended for wilderness designation. Both of these areas, according to BLM, have no resource conflicts. There is no timber and drilling has yielded four dry oil and gas wells. Apparently grazing and OHV use are to be cut back or prohibited. But these measures will be only a partial solution. Camel Back is the site of several endengered plants species, as well as big game herds, and Adobe Badlands is a habitat of an endengered cactus. Both these areas have important wilderness characteristics, including a canyon containing colorful sandstone formations in Camel Back, and vistas of the San Juan Mountains and Uncompahgre River valley in Adobe Badlands. We need more than stop-gap measures to protect these wild places.

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p. 2

69 The third action by BLM to which I object is a five-year "grace period" extended to developers of a ski site at Storm King. According to BLM itself, this area is a critical elk calving ground. In addition, development here would also have an adverse effect on mule deer fawning. By putting off action for five years while developers proceed with their plans is virtually to make a decision now in favor of the developers; it would be many times more difficult to give elk and mule deer, as well as other wilderness values their full due with the developers' interests entrenched by five years' investment and effort. These are public lands, and a decision as to their suitability for wilderness or other uses should be made now, before private uses are allowed to proceed. There must be a better way to assess "compatibility."
Thank you for your time and consideration.

Sincerely,

Chris Seitz

Chris Seitz
124 South Hilldale
Salina, Kansas 67401

59

9-25-87

Gene Vecchia—
I have been advised that BLM has recommended Gunnison Gorge for wilderness protection. BLM is to be commended highly for taking this position.
68 I hope you will decide
136 to take a similar position on Camel Back (Roubideau Canyon) and the Adobe Badlands.

Thomas G. Scott

Dr T Scott
1635 Adrial Dr
Ft Collins Co
80524

60

September 23, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia;
I am writing concerning three different areas you studied for Wilderness areas and a Ski area proposal.
First of all, I would like to thank you for recommending the Gunnison Gorge Wilderness area for protection. The importance of this decision cannot be under-rated. This area contains 13 miles of the Gunnison River which has been up for recommendation as a Wild River under the Wild & Scienic Act. The BLM has made a very positive decision that I support and hope they will continue to do in the future.
Secondly, the CAmel Back area, which I believe should be recommended as a wilderness designation. There are not timber or mineral conflicts over this 10,402 arces of land. It also contains about 7 miles of perennial Roubideau Creek where it cuts through a 800 foot deep canyon of beatufil sandstone formations of the Uncompahgre Plateau. More important several
136 endangered species of Plants and big herds who live in the area which would greatly benefit from a wilderness designation. I cannot understand why the BLM decidied NO on this proposal, please explain why they have made this decision. OUr state is expercining many problems with protection of our natural lands and animals, we have a great opportunity to insure the Colorado we know and keep the unquie attractions that people from all over come to see.
The Third area is the Adobe Badlands which contains 10,425 acres of the Mancos Shale Badlands. They have tested for oil and gas and found no real mineral potential, and obvously there are no timber for cutting. Wehave an area that provides sweeping vistas in the San Juan Mountains and the
68 Uncompahgre River Valley. It also contains the endangered Unita Basin hookless cactus which in itself is a real treasure. Again, this is an area which there is not alot of conflict over a wilderness designation. I am very confused by the BLM decision not to recommond this area, and I would greatly appreciate an explanation.
The last issue is about the Storm King Ski area proposal. This area is 1,000 acres of BLM Land on the north end of Cimmaron Ridge. Now the BLM have stated that this Ski area would elimiate the ELK CALVING habitat and have an impact on the Mule Deer fawning grounds. Their solution to the problem is to grant a 5 year grace period to the developers to go ahead and start with the ski area and then let them know if they will approve the ski area after they have spent 5 years developing the 1,000 acres of land.
69 The BLM is suppose to assess the compability of resources, not to give developers a five year head start. Our Elk and Deer areas have been greatly reduced in just a few years, alot more than mort peopel realize. The BLM needs to take another look at their decision, and the role of the BLM in land management decisions. The Elk and Deer populatins cannot come forth and speak for themselves is such matters, they are subject to the whims of men. I feel that the Deer & Elk should have their birthing places protected, its not like they have many places all over the state.

Thank you for very much for your time with these ost important matters.

Sincerely,

J J Harper

Jenna J. Harper
P.O. Box 298
Black Hawk, CO
80422

61

9-24-87

Dear Mr. Vecchia,

We are writing to inform you of our feelings on the wilderness recommendations of three arens in the Montrose BLM district. We frequently use wilderness areas of the state for backpacking trips. We have hiked in all but two wilderness areas of the state. We are very concerned about the future of "wilderness" in our nation.

We are happy to hear that the BLM is proposing to protect the Gunnison Gorge area. This area with its proximinity to the Black Canyon of the Gunnison National Monument and 13 miles of the Gunnison River will make a wonderful addition to the other areas in the state.

136 The Camel Back area seems to fall into wilderness consideration and we would like to know your reasons for not recommending this area. We understand that there are no resourse conflicts and that grazing is to be cut back in this area to protect the riparian zone. Why not protect the entire 10,402 acres with a wilderness designation? We would like to see this area of the Uncompahgre Plateau saved before it is too late. Please explain your stand on this.

68 We also ask you to recommend the Adobe Badlands for wilderness as it has sweeping vistas and is home to an endangered cactus. This area has little resource potential and it would be nice to have an area that is in contrast to our mountains and riparian wilderness areas.

We thank you for your time in considering our views on this matter.

Sincerely,

Judy Kieca
Marv Kieca

Marv Kieca
Judy Kieca
201 S. Wilcox
Castle Rock, CO 80104

62

0-22-87

Julie M. Emerson
P.O. Box 66
Littleton, co
80160-0066

Dear ~~xxxx~~ Gene,

69 I am writing to you about the Storm King Ski Area ~~xxxx~~ site. I am against the development of a ski resort in this area. This is a elk calving sounds and teh mule deer fawning area. Please dont procedd withteh 5-year grace period for tge ski area developers. Storm King Mountian should be left for the elk and deer.

Thank you very much.

Sincerely,

Julie M. Emerson

63

0-22-87

Julie M/ Emerson
P.O. Box 66
Littleton, co
80160-0066

Dear Gene,

I am writing to you about three areas; Gunnison Gorge, Camel Back(Roubideau Canyon), and Adobe Badlands.

First of all on the Gunnison Gorge thank you for your ~~xxx~~ recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for Wilderness protection.

136 Second, please recommend the Camel Back for Wilderness Protection. Thank you for cutting back on the grazing to protect the riparian zone. We need to protect the uncompahgre plateau, it is a major landform of western colorado. There are also some endangered plants and the big game herdsthat need protection. There is no timber or mineral conflicts here. Please again help to protect this area ~~x~~ along with the Gunnison Gorge.

68 Third, Please recommend the adobe Badlands for wilderness designation. This area is home to endangered cactus, the mineral potential is low, and there is no timber to fall. Thank you again for closing this area to off-road vehicles. Please blant to protect this area along with the Gunnison Gorge.

Thank you very much.

Sincerely

Julie M. Emerson

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207-29Rd.
Grand Junction, Co. 81503
September22, 1987

Gene Vacchia
RMP Team Leader
BLM
2505 S. Townsend Ave.
Montrose, Co. 81401

Dear Mr. Vecchia,

As a citizen of western Colorado and an avid outdoorsman I would like to offer my thanks and congratulations to you and the BLM for the wilderness designation recommendation for the Gunnison Gorge Wilderness Study Area. If the recommendation is accepted an invaluable and irreplaceable part of the west will have been saved from further exploitation and will have been afforded the necessary protection so that future generations may too enjoy its splendor.

136 To my consternation though I understand that in your draft for the Uncompahgre Basin RMP that you have failed to include of the Camel Back Study Area for Wilderness protection. I find this very disturbing and the decision borders on the ludicrous. A public accounting for this decision is certainly in order, especially in light of the BLM's admission that there are no resource conflicts with wilderness designation for the area. That such an incredibly diverse and beautiful area as the Uncompahgre Plateau has no designated wilderness areas is in itself a disgrace. At hand lies the opportunity to rectify this situation, albeit in a very small way. I ask that the Camel Back Area be given wilderness designation, to do otherwise would be a travesty.

68 Another discrepancy in the report I would like to address is the exclusion of the Adobe Badlands from wilderness designation. Again, this decision is uncomprehensible. Those familiar with the area know any resource conflict is virtually non-existent while the beauty and solitude offered are quite unique. Most of the Dobies have been severely and racklessly abused for generations, surely at least this very small part deserves the protection afforded by wilderness designation. Again, I must ask the BLM to publicly explain its' decision in this matter and ask that the decision be sensibly reversed.

69 The issue of the Storm King Ski Area Site is also very disturbing to me. By the BLM's own admission the ski area would eliminate a critical elk calving habitat and mule deer fawning area. In a time of ever increasing pressure upon big game populations by hunters and development how you can rationalize the sacrifice of this habitat is beyond me. As both a hunter and a conservationist I find the decision to allow a 5-year grace period in which development would proceed to be absolutely indefensible. In a time when all long range forecasts for the ski industry say the sport faces declining numbers because of the aging of the baby-boomers it becomes all the more ridiculous to sacrifice such an important area to the short-term profits of a few developers. I ask that this decision, too, be reversed for the sake of all long term interests and values.

67 Another area of personal concern is the off-the-road-vehicle use on public lands. This situation is entirely out of hand. No area is safe from the

page 2. 64

55 misuse and destruction by these ORV's. Is there no set of existing regulations covering this growing problem? If not, why not? Granted, a powerful lobby exists that would oppose any restrictions but surely in the light of the ever increasing damage being done to lands under BLM management the BLM itself should draw up, at least, minimal guidelines.

I would suggest that because the evidence is so overwhelming that the users of ATV's and dirt bikes are unable , or unwilling, to use public lands in a responsible manner that they be banned entirely. At the very least they should be restricted to existing roadways only, with stiff fines for any offenders. 4-WD's should be restricted to the roadways also, with the same penalties against offenders. I know enforcement would be difficult, at best, but, as on Forest Service lands where restrictions are in force, the simple posting of restrictions would, in most cases, reduce the damage considerably.

Thank you for your time and consideration. I would appreciate hearing from you regarding these issues.

Yours truly,

Dan Roberts

cc. Congressman Ben Campbell

2531 P Rd.
Cedaredge, CO. 81413
September 27, 1987
Phone: 856 3486

Dear Sir,

I very much approve the BLM's decision to recommend the Gunnison Gorge for wilderness designation. Over much of its length the canyon of the Gunnison river is one of western Colorado's jewels. It is a splendid recreation area for residents and visitors alike. Perhaps wilderness designation for the gorge would also help secure wild and scenic classification for that section of the river, which I also support.

However, it is difficult to understand why the Adobe Badlands area in Delta County and the Camel Back area in Montrose County were not recommended. Both areas contain significant beauty and, as the BLM's own studies indicate, both areas have very little if any economic potential. It is difficult not to conclude that the decision has an inherent bias against wilderness.

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Although several surveys have shown that there is widespread support among the American people for wilderness, there seems to be a perception on the part of some, perhaps especially among those who hope to make money off of the public domain, that wilderness areas are primarily for the exclusive benefit of a few, hearty outdoor types, often referrad to as "elitists". It seems to me that this is a misconception.

It is true that, since roadbuilding is not permitted, those who can only experience the out of doors in a car are pretty much excluded. But would those who use this argument suggest that a road should be built to the top of every mountain peak in the state to accomodate these people?

Unfortunately, life is like that; not everybody can do everything. Young children cannot appreciate the joys of sex. Old women can't have babies. No matter how much I may want to, I can never be a professional football or basketball player. People who are too poor to get out of the inner city can never experience the beauty of the Grand Canyon. One could go on.

My personal perception is that support for wilderness, even among those who may never hope to visit one of the areas,

arises from two important aspects of American life: the sudden flowering of a vigorous conservation ethic, and the innate religious impulse common to most humans.

THE CONSERVATION FACTOR

When white people first came to the North American continent they stumbled upon one of the richest pieces of real estate on earth. The land contained everything needed to support a large human population--vast stretches of rich soil; a moderate climate; for the most part, adequate rainfall; a wonderful system of rivers; hundreds of miles of forest and grassland; generous deposits of minerals; a land teeming with wildlife.

With the sudden development of the industrial revolution, which made possible a speed and degree of exploitation never before imagined, and the immigration of a vigorous and ambitious population, that vast storehouse has been harvested at a rate unparalleled in human history.

Rivers and ground water have been polluted. Vast piles of poisonous wastes have been left exposed to the elements. The air in many areas has become unfit to breath. Top soil is rapidly being flushed into the oceans. The readily available minerals have been mined. Forests have been leveled and native grasslands plowed up. Huge herds of game animals have been eliminated. Unfortunately, much of this exploitation was done not to satisfy legitmate human needs but to make a fast buck, and to hell with the consequences.

The situation has deteriorated to the point where the American people are beginning to recognize that if we are going to survive as a nation and as a people we need to begin to avoid waste and pollution, we need to clean up our messes, and we need to begin to live frugally on the land.

THE RELIGION FACTOR

Any religion worthy of the name has some beliefs about the creation of life and of the universe. It also has something to say about how we humans should relate to the creator and to the creation. The native American religions, for example, have certain beliefs about a great spiritual father and also regard the earth as our mother. They teach that we should conduct ourselves with reverence toward both.

Christianity is no exception. The first words in the Bible are, "In the beginning God created the heaven and the earth." Then it goes on to point out man's place in the scheme of things--

that he was placed in the garden of Eden "...to dress it and keep it", not to despoil it or ruin it or exploit it, but to make it beautiful and fruitful and undurring.

Many of the Psalms continue this theme. The 19th, for example, begins with the words, "The heavens declare the glory of God and the firmament sheweth his handiwork." The 24th begins, "The earth is the Lord's and the fulness thereof, the world and they that dwell therein." And in the book of Revelations (11:16-24) thanks is given to God because, among other things, he is going to "...destroy them which destroy the earth."

It is too bad that we find it necessary to set aside certain small sections of the country as wilderness areas, actually, the whole earth should be treated with respect, but at least it is a small step in the right direction. We owe it to ourselves, to our children, and to our noblest beliefs to tread so lightly on the earth that we leave the smallest tracks possible.

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I would like to see the BLM reconsider its decision on the Adobe Badlands and the Camel Back study areas.

Sincerely,

Chuck Worley
Cedaredge, CO

28 Sept. 87

Dear Gene Vaccha,

I attended the hearing in Hotchkiss and agree with the Gunnison Gorge being a wilderness area. I also hearing seen Camel Back and Adobe Badlands we think they should be included in the wilderness area of western Colorado.

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We disagree with the storm trail Ski area, Especially the trial period.

(over)

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Thanks for the good work you have done Protecting our greatest Natural resource

Sincerely,

William J. Tomkovich

Kathleen A. Tomkovich

John P. Tomkovich

Nicole A. Tomkovich

Jesse R. Tomkovich

67

527 Gilpin St.
Denver, CO 80218

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

We would like to thank the BLM for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. We support continued protection of the Gunnison Gorge.

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We would also like to see the Camel Back Wilderness Study Area and the Adobe Badlands recommended for wilderness designation. By BLM's own admission there are no resource conflicts with wilderness designation of the area. We hope that these two areas will be preserved.

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One other area which concerns us is the potential Storm King Ski Area site. We do not support another ski area in Colorado, especially in an area which happens to be critical elk calving grounds. At the very least, the plan should assess compatibility of resources, not give one a five-year headstart over the other.

Sincerely,

Ellen B. Braaten

Eric D. Braaten

68

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area

September 28, 1987

Dear Mr. Vecchia,

Upon review of the draft Uncompahgre Basin Resource Management Plan, I feit it necessary to voice my concerns regarding the wilderness recommendations it contained. I em in full support of your recommendation that the Gunnison Gorge wilderness study area be protected. The 21,038 acres of wilderness that Gunnison Gorge contains is indeed an area worth defending. However, I am dismayed that you did not apply the same reasoning in your consideration of the Camel Back and Adobe Badlands for wilderness protection as well.

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Like Gunnison Gorge, Camel Back contains thousands of acres of beautiful wilderness area. The existence of big game herds and several endangered species of plants that currently thrive in Camel Back could be threatened if the area remains unprotected. As well, there are no timber or mineral conflicts in the area that could justify allowing its wilderness qualities to be destroyed.

The Adobe Badlands is another area that needs to be protected, not ignored. In addition to being the home of the endangered Uinta Basin hookless cactus, the badlands provide its visitors with sweeping vistas of the San Juan Mountains and the Uncompahgre River valley. There is no timber in the area, and four dry oil and gas wells have been drilled nearby the badlands, indicating there is little conflict with a decision to supply wilderness protection. The same rationale used to designate wilderness protection for Gunnison Gorge should be applied to Camel Back and Adobe Badlands as well.

A final area of concern regarding the draft involves the BLM's decision to allow developers a 5-year grace period in which to proceed with a ski area site on Storm King Mountain. The 1,000 acres of BLM lands located on the north end of Cimmaron Ridge are critical to the survival of elk that use the lands as calving grounds. Such development would also have an adverse impact on mule deer fawning areas. For these reasons, the grace period

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granted in the draft should be eliminated.

I would appreciate your sharing our concerns with the above issues when preparing your final draft of the Uncompahgre Basin RMP.

Sincerely Youre,

Harry Kuperberg

Harry Kuperberg
820 University
Boulder, CO 80302

69

Dear Gene:

I am a concerned citizen writing in reference to your proposal not to protect Camel Back and the Adobe Badlands as potential wilderness sites. Why don't you consider these two pristine areas for wilderness designation. By your own admission, there are absolutely no resource conflicts with wilderness designation in the Camel Back area. I would love an explanation to this asinine approach to management of a shrinking resource such as wilderness

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As far as the adobe Badlands goes-Again there is virtually no resource conflicts- no timber, no minerals and the BLM intends to close it to ORV use. So why not designate it wilderness and be everyone in the United States a favor. If you could send me an explanation as to why these two areas are not being considered for wilderness - I can be reached at - Box 650 Winter Park, Co 80132

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Thanks Roger Hadland

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1374 E. Third Ave.
Durango CO 81301
September 30, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Dear Mr. Vecchia:

I wish to thank the BLM for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection.

136 I also wish to ask the BLM to recommend Camel Back for wilderness designation. There are no resource conflicts. This landform, its herds, and its plant species need protection to avoid gradual destruction.

68 And, finally, I hope the BLM will recommend Adobe Badlands for wilderness.

Thank you

Sincerely,

Victoria and Will Coe

Victoria and William Coe

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Dear Sir:

Thank you for your recommendation FOR wilderness for Gunnison Gorge. I urge you however also to

68 136 SUPPORT WILDERNESS DESIGNATION for Camel Back and Adobe Badlands in their entirety.

69 I would also like to urge you protect Storm King Mountain for its elk habitat.

Thank you.

Sincerely,

Jon Sipkis
2808 DUFF St. #X12
Boulder, CO. 80301

72

CLEE SEALING
MARY MC AFEE SEALING
1878 N'L ROAD
FRUITA, COLORADO 81521

Dear Mr. Vecchia -

We would like to comment on the Uncompahgre Basin Resource Management Plan:

68 - We do not see any reason why the Adobe Badlands should not be recommended for wilderness. Since there are very few conflicts, this designation should be glassed.

136 - The Camel Back area should also be designated wilderness. There are clearly no wilderness conflicts, and Camel Back is one of the last wild areas on the plateau.

- We are very pleased with the wilderness recommendation for Gunnison Gorge, and hope that we can encourage more such action.

Sincerely: Mary Sealing

73

613 Maxwell
Boulder, CO 80302
Sept. 20, 1987

Gene Vecchia, RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I wanted to comment on the draft Uncompahgre Basin Resource Management Plan.

62 First, I want to endorse the recommendation of the Gunnison Gorge for wilderness protection. This would make a fine addition to the Wild and Scenic Rivers trust. The expansion of the area adjacent to the all ready protected Black Canyon is right in line with the latest thinking of the need to protect large areas of similar ecology. Small ecosystems are not as inherently stable, and every measure to increase their size helps.

Next, I am disappointed that the Camel Back and Adobe Badlands were not included in the wilderness recommendation.

136 Camel Back, according to your own report, has no mineral conflicts. The area is one of the few potential wilderness areas in the Uncompahgre Plateau, which currently has no designated wilderness. I think that this area should be included for wilderness recommendation to avoid the degradation by road building, which is sure to happen.

68 I don't understand the lack of inclusion for Adobe Badlands. Clearly again, there are no mineral or timber conflicts. This desert with it's fine views should be protected by wilderness recommendation.

69 Finally, I don't understand the Bureau's intentions with the potential Stora King ski area site. With the downswing in ski business, along with increased competition from existing areas, I really don't think that another destination ski area has much of a chance. So I don't think that the local economy will really get a boost from developing it. To gamble the certain loss of elk calving grounds against profits for a few developers is wrong. The Bureau's 5 year wait-and-see plan will give the developers a free leg up, at the expense of the other resources, primarily elk.

As a professional engineer who likes to ski, hike, and enjoy the wilderness, I would like to think that the BLM is considering people like me and our concern for wilderness in it's management plans. There is so little to lose in protecting wilderness, and so much to gain.

Thank you for reading my comments.

Sincerely,

Timothy J. Cunningham

Timothy J. Cunningham, P.E.

74

October 2, 1987

Gene Vecchia
RMP Team Leader
BLM
2505 So. Townsend Ave.
Montrose, Co., 81401

Dear Sir,

I wish to address recommendations in your draft Uncomphagre Basin Resource Management Plan.

First, I support the designation of Gunnison Gorge USA for wilderness. That is in my opinion the strongest feature of the draft plan and an exceedingly good idea.

136 I urge that the Camel Back area also receive wilderness protection due to its place as one of the few areas on the Uncomphagre Plateau that could preserve a wilderness character there. I urge that the wilderness qualities there be kept, not lost, especially given no real resource conflicts with such an action.

68 I believe Adobe Badlands also warrants wilderness preservation. The vistas alone they provide are worthy of protection. They, too, have low resource conflicts and, in my opinion, hold no real obstacle to a wilderness designation.

69 Finally, I oppose any allowance for ski area development on the north end of the Cimmaron Ridge. The plan acknowledges the importance of that area for elk calving and mule deer fawning. Our state has lost too much such habitat already. I urge the BLM to make a strong commitment to preserve this area for wildlife habitat.

Thank-you.

Sincerely,

Mark Meeks

Mark Meeks

500 St. Paul
Denver, Co 80206

75

3505 W. 39th Ave.
Denver, CO 80211
September 30, 1987

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

68 136 I strongly recommend the inclusion of Camel Back and Adobe Badlands in the proposed Gunnison Gorge Wilderness area. This is part of the Uncompahgre Plateau, yet it has not a single acre of designated wilderness. Camel Back is one of the handful of potential wilderness left on the plateau.

Yours truly,

Lorraine Lane

Mrs. Lorraine Lane

76

728 8th Street
Boulder, CO 80302
October 3, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Dear Mr Vecchia:

68 136 I am writing this letter to you to ask that the B.L.M recommend the Camel Back and Adobe Badlands Wilderness Study Areas for wilderness designation. These are beautiful areas with virtually no conflicts, such as timber or mineral. So I don't understand your decision for their non-wilderness recommendation. Could you explain to me why?

I do want to thank you for recommending all 21,038 acres of the Gunnison Gorge W.S.A for wilderness protection. It's a precious area and should be protected.

69 Finally, I request that you manage Storm King Mountain for elk and not ski area developers.

Thank you.

Sincerely yours,

Jane E. Schleimer

77

Grand Junction, Colo.
Oct. 7, 1987

Dear Mr. Vecchia,

It appears that you have earned some promotions! Congratulations!

Regarding the wilderness recommendations, the BLM is "right on" with Gunnison Gorge. Thank you, and all those involved.

136 I believe that Camel Back should also be recommended for Wilderness. We should be more generous toward wilderness than we are toward those who so constantly and consistently compromised and destroy wilderness values.

69 In addition, Storm King Mountain should be managed for deer and elk. More than enough of our mountains are dedicated to the ski industry, a situation that can never be reversed.

Sincerely,
Harley Orahood
(USFS; Retired)

78

Robert E Vecchia
RMP Team Leader - BLM
2505 South Townsend Ave.
Montrose, Colo 81401

Dear Mr Vecchia,

The best alternative offered to support the multiple-use objective with the fewest detriments to livestock grazing, is the "Continuation of Current Management."

64 I strongly oppose all Wilderness Areas. We need our cattle industry. As far as any damage to the area by cattle I have seen areas hundreds of cattle graze on and pass through with no ill effects, only tramped in seed and fertilizer, also less fire hazard because it is grazed.

I have also seen where only a handful of people camp or pass through with cans, glass, plastic and general trash left cluttering the area for years to

78

come. The cattle people have managed these lands for years and do take care of the land. They have respect for it. Please see fit to back them.

Mrs Robert Gray
4290 Cedar Rd
Delta, Colo 81416

79

J. Kanich
Box 22
Mabon, CO 81421

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Yours, Jan't Love
Pipher

Signed:

80

Gene Vecchia, RMP Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

October 14, 1987

Dear Mr. Vecchia:

I would like to congratulate the BLM on its wilderness recommendation for Gunnison Gorge. It is to be hoped that this protection will soon be law.

136 I would like, however, for the BLM to reconsider its non-wilderness
recommendation for the Camel Back Wilderness Study Area. There are
no known resources of importance here, by the BLM's own admission,
and wilderness designation would protect this important riparian
68 community on the Uncompahgre Plateau. I hope the BLM will also
recommend the Wahe Badlands, with its rare hookless cactus, for
wilderness designation.

Sincerely,

Bruce Berger
Box 402
Aspen, CO 81612

81

Mark N. Williams
Attorney at Law
327 North Seventh
P.O. Box 23
Grand Junction, CO 81502
(303) 242-3111

October 12, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia

Your Bureau's plans for future recommendation of land use regarding desert wilderness designations have come to my attention. I want to thank you for your recommendation concerning the Gunnison Gorge. I must express my distress, however, concerning your Camel Back and Adobe Badlands recommendations. I request that your organization take another
68 long, hard look at the recommendations and do more extensive
136 research, study and re-thinking before excluding Camel Back and Adobe Badlands from desert wilderness designation.

I was appalled at your giving thought to allowing yet another ski area in Colorado much less one at the north end of Cimarron Ridge. To even think of disturbing the elk and deer
69 habitat is ludicrous. I was under the impression the Bureau was organized as a steward for this country's natural resources. Please do not allow private developers to misguide your guardianship.

Please, rewrite your recommendations for Camel Back, Adobe Badlands and Cimarron Ridge for the preservation of our wilder-
68 ness areas that need so much protection.
136
We must preserve our wilderness areas. It is vital that the Bureau and the citizens of the area discuss and study these arbitrary decisions before they become policy.

Sincerely

Mark N. Williams

MNW:sh

82

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed: Cheri W. Pettis 10-12-87
Kenneth E. Pettis 10-12-87

83

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
136 No Wilderness alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed: Cheri W Pettis 10-12-87
Kenneth E Pettis 10-12-87

84

Date: 10/12/87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Sincerely,
Arthur Nelson
Kay Dickinson

Signed:

85

Date: 10/12/87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) ~~(dunnot)~~ agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
136 Site-specific objectives can be mitigated through the Allotment Management Plans.

Sincerely,
Arthur Nelson
Kay Dickinson

Signed:

86

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed:
Mr & Mrs William W Byers
Dr. Edward Byers
Edward Byers

87

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
136 Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed:
Mr & Mrs William W Byers
Dr. Edward Byers
Edward Byers

88

Date: 10-12-87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

None
Alford Gray
Patricia Harris

Address
Olathe, Co 81425
Olathe, Co. 81425

Signed:

89

Date: 10-12-87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I [redacted] (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 136 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

None
Alford Gray
Patricia Harris

Address
Olathe Co 81425
Olathe, Co. 81425

Signed:

90

Gentlemen,

I am writing to you again about the proposed Cassiback and Adobe Hills wilderness study areas.

I am a native. My grandparents were cattlemen on a ranch near Norwood. In those days they didn't have income and property taxes. Today cattlemen still don't pay taxes and they receive subsides, handouts, low interest loans, bailouts, ect. They are for the most part the complete opposites of the independent self-sufficient people of the past.

The history of The Uncompahgre after the forced departure of the Ute Indians is of total exploitation. Huge cattle concerns, many from people in England who never saw or cared about the land proceeded to rape it. "Competition for grass reached self-destruct excesses when the range was wide open. Each cowman stocked his area with as many cows as he could lay cash or acreage to and grazed to the roots. If he didn't, somebody else would. The herds were enormous. One old-timer remembers seeing fifty thousand head in one bunch held for shipment on what is now Grand Junction suburbs-- The Redlands.

Overgrazing brought on regulation to save the mountain from dying, as mountains up around Gunnison died in that area. To bring grazing within the capacity of the range to maintain itself, the Forest Service gradually (and proportately) reduced the herd population of the allotments.2

Today sagebrush, cluaps of pinion-cedar and the desert environment are a direct result of past and present abuses.

The 1930 Taylor Grazing Act started the BLM. It covered land not in control of the Forest Service.

90

I live on Log Hill and personaly know how hard it is to return the land to it's former productive self. It will probably take twenty or thirty years on my 40 acres.

Special interest groups like to mention the multi-use or more properly the multi-abuse approach to public land management as though it was a popular approach, nothing could be further from the truth. During the Ford Administration they had hearings all over for the proposed wilderness areas. "Citizens who testified at the Forest Service hearings in Colorado in January of this year or submitted statements for the record supported nearly five to one the Colorado Open Space Council citizen recommendations for three wilderness areas totaling about 172,000 acres.'2

Certain special interest groups especially the Chamber of Commerce whispered in the more than receptive ear of the Ford Administration who whispered into the Forest Service's receptive ear, that they didn't like the outcome of the hearings. It's interesting to note that former president Ford has a vested interest in the Beaver Creek Ski Area.

We have a responsibility to future generations to see that they have places to go and enjoy untouched wilderness areas free from small-narrow-minded special interests groups who want public land for they're own private use and profit.

Sincerly,

W.Rodney Mckinnon
7868A County #1
Montrose, Colorado 81401

90

1. Uncompahgre, Muriel Marshall P/35 Caxton Printers, Ltd. Caldwell, Idaho 1981

2. The Denver Post, Sunday Dec. 8 1974 P/3E The quote was from Clifton Merritt, regional director of the Wilderness Society.

91

Mike Campbell
P.O. Box 112
Oak Creek, CO 8046

Gene Vecchia, RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia;

I want to begin by thanking you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for Wilderness protection. I grew up in Gunnison and was often impressed by this areas fishing and hiking.

68
136 I also want to ask you to recommend both Dobe Badlands and Camel Back (Roubideau Canyon) for wilderness designation. By BLM's own admission, there are absolutely no resource conflicts with wilderness designation in these areas. Both areas have low potential for minerals and there is obviously no timber. Your positive steps in these areas has ~~does~~ not ~~gon~~ gone unappreciated (your intentions to cut back on grazing in Camel Back and your intentions to close the Dobe Badlands area to off-the-road vehicle use).

69 My final appeal to you is my belief that the potential Storm King Ski area should be

91

69 eliminated now rather than allowing ~~them~~ the 5 year grace period in which the developers may proceed with the ski area development. I feel the elimination of elk calving habitat, as well as the large negative impact on mule deer fawning areas as a result of the developers actions should definately be avoided.

Thank you for your time and consideration.

Sincerely,
Mike Campbell

92

October 8, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S Townsend Ave.
Montrose, Co. 81401

Dear Mr. Vecchia

I would like to provide brief comments regarding the recently released Uncompahgre Basin Resource Management Plan. As a frequent visitor to this portion of the state, I have had the pleasure to enjoy this fine area (as well as aid the local economy through purchases at local stores). My purpose to visit is not to view logging areas or oil rigs or other such industrial artifacts but to enjoy the lasting beauty of the terrain.

It is with real regret that I learned the plan does not designate certain areas for wilderness protection that really deserve it. It appears the Gunnison Gorge has been recommended for wilderness protection and that is perfect. That river is a recreational resource that will do more for the economy and environment over the years than any development ever could.

68
136 But what happened to Camel Back and Adobe Badlands? The Camel Back area has no mineral value at all as referenced in the plan itself and should be designated for wilderness in that the Uncompahgre Plateau includes no wilderness at all at this time!! THIS AREA SHOULD BE DESIGNATED AS WILDERNESS.

I am not as familiar with the Adobe Badlands but it appears this area has no mineral or logging values at all and it to should be preserved as wilderness.

Please incorporate these comments into your review process and alter the plan to reflect these areas as wilderness.

Thank you for your consideration and action on these thoughts.

Sincerely,
Edward G. Talbot
6333 Kendall Street
Arvada, Co. 80003

93

Date: 10/14/87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

I have had a permit since 1920 and I find the Current Management is taking care of our range in best condition

Leonard L Busch
Helen M Busch

Signed:

94

Date: 10/14/87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement

I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 136 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use manageme Site-specific objectives can be mitigated through the Allotment Management Plans.

We don't need wilderness in the Camel Back area as it is best managed under multiple use.

Leonard L Busch
Helen M Busch

Signed:

95

Andrew McCarley
3590 Berkley Ave
Boulder, CO 80303
October 13, 1987

Gene Vecchia, RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

69 Please deny permission to develop a ski area on the north end of Cimmeron Ridge. Your own plan admits that such a development would eliminate critical elk calving habitat. Your idea for a five-year "grace period" is a cop-out. You must decide now whether plans for Storm King ski area should proceed or not. We have too many ski areas in Colorado already. I urge you to protect the elk.

Thank you for recommending Gunnison Gorge for wilderness. I have enjoyed hiking there in the past.

68 136 But I do not understand why Camel Back and Adobe Badlands were not recommended for wilderness. Both areas possess fine wilderness characteristics and no significant conflicting potential uses. Please include these comments in the public hearing record.

Andrew McCarley

96

JOHN C. CALHOUN AND ASSOCIATES
CERTIFIED PUBLIC ACCOUNTANTS
840 PALMER STREET
P. O. BOX 460
DELTA, COLORADO 81416
874-8781

GEORGE C. CALHOUN, C.P.A.
MICHAEL E. CALHOUN, C.P.A.

MEMBER
AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS
COLORADO SOCIETY OF CERTIFIED PUBLIC ACCOUNTANTS

October 19, 1987

Robert E. Vecchia
RMP Team Leader
2505 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

Having lived in this area all my life, and seeing the improvement in range conditions over the past years I would support the continuation of the present continuation of the multiple use management concept.

The use of the land for livestock grazing, wildlife, recreation, mineral exploration, and forest products must be considered as of imminent importance to the "west" and the United States.

68 136 The camel back and adobe badlands should be excluded from wilderness classification because of historical use. The charge of ownership of the Black Canyon may very well call for the change in classification which does not bother me in the least. The other areas, in my opinion, do not lend themselves to wilderness classifications.

Very truly yours,

George C. Calhoun

George C. Calhoun

xc: D.R. Gore
36850 Fern Rd.
Olathe, CO 81425

97

Gene Vecchia
RMP Team Leader
Bureau of Land Mgt.
2505 S. Townsend
Montrose, CO 81401

1946 Clover Court
Grand Junction, CO 81504
October 19, 1987

Dear Mr. Vecchia:

The purpose of this letter is to comment on the Resource Management Plan for the Uncompahgre Basin.

I wholeheartedly support wilderness protection for the Gunnison Gorge. The area is beautiful, unique, and wild. Even now, however, helicopter parties come into parts of the lower gorge for fishing. Please maintain your strong stand to protect this unique resource.

69 I am baffled by the Storm King Ski area plan. Here in Grand Junction, our beautiful ski area has been in financial trouble for years. A new owner is sure that fixing up some things would improve revenue and now he is facing the possibility of the bank taking over. Many other areas have gone up to $30 and more ski passes. Can you afford to ski? My family cannot - but we can afford to hike and camp and x-country ski and that's why wild areas must be maintained. This area is important elk habitat. Please preserve it as such.

136 I have hiked Robideau Canyon on the Uncompahgre. Its the best place on the plateau. Your plan really gives no rationale for not recommending wilderness designation. I have small children and I want them to have areas like this to show to their children in 20 years. The Camel Back area is wilderness - please designate it as such.

68 Finally, what about the Adobe Badlands? Yes this is badlands. Thank goodness you are banning off-road vehicles. So many of these areas are overun with ORVs - and that's fine. They need some places, but hikers need some too. Hiking through an open desert and knowing you cannot be run over by a motorcycle is a wonderful feeling. The views from this area are spectacular. Let the hikers have one of these areas too and designate Adobe Badlands as wilderness.

Thank You
Nic Korte

October 18, 1987
Box 263
Florissant, CO 80816

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

It is my understanding the BLM is in the process of finalizing its Uncompahgre Basin Resource Management PLAN. It is doubtful anything I can suggest will be of value even tho I have spent over thirty-five years in land management in the National Park Service and private ranching. It seems each new generation of land managers must re-invent the wheel without fully utilizing past experiences and studies (?).

68 Regardless, please keep in mind that wilderness designation
136 can always be rescinded but wilderness can rarely be reclaimed within a lifetime, as you evaluate the Gunnison Gorge, Camel Back, and the Adobe Badlands.

Please consider the pure economic point-of-view in evaluating the Storm King Ski area site. A successful ski area of moderate size in Colorado is shaky at best and many have incurred bankruptcy in recent years due to the industry's overkill. It is ludicrous to think the area's economics can be bettered by a ski area over current big game hunting resources.

69 Often the best management of land is to physically leave it alone. I can only hope your successors will be proud that you left them something to manage wisely.

Sincerely,

Jack R. Williams

October 16, 1987

Gene Vecchia
Bureau of Land Management
2505 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

First, I would like to commend the BLM for recommending the Gunnison Gorge NSA for wilderness protection. Secondly, I would encourage the BLM to recommend that Camel Back and the Adobe Badlands also
68 be given wilderness protection. Both areas
136 have little to offer, in terms of mineral or other resources, and I believe that both areas would be a unique additions to our wilderness lands, especially Camel Back. Again, thanks for Gunnison Gorge.

Sincerely,
John M. Kutzman.

Date: [illegible]

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the "[redacted] Current Management"
Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed: [illegible]

101

Date: 10, 20, 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I [redacted] (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
136 [redacted] alternative. This alternative best exemplifies the multiple use management [redacted] specific objectives can be mitigated through the Allotment [redacted].

Signed: Al Hahn
Al Hahn
441 1 00 Rd.
Delta, Colo.
81416

102

10/20/87

Dear Mr. Vecchia,

I would like to begin by expressing thanks to the Bureau of Land Management for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection.

An addition, I would like to strongly suggest BLM wilderness protection for the Camel Back area and Adobe Badlands. By your own admission, there are absolutely no resource conflicts with the Camel Back area. Camel Back is one of only a few potential Wildernesses left
136 on the Uncompahgre Plateau and wilderness designation would greatly benefit big game herds as well as several endangered plant species. The BLM's intention to allow gradual destruction of this beautiful wilderness is an approach I cannot understand. Please seriously reconsider

As for the Adobe Badlands, this area offers no timber and apparently little mineral value. What is to keep us from preserving this area for the enjoyment of future
68 generations to come? The Badlands provide sweeping vistas of the San Juan Mountains and the Uncompahgre

102

68 River valley and are home to an endangered cactus species as well. Please recommend the Adobe Badlands for wilderness designation.

Thank you for your consideration in preserving these beautiful and precious wilderness areas (which have so little value to developers yet so much to offer if left in their natural state.)

Sincerely,
Diane Kelly
2757 Sciota rd.
Evergreen, Co.
80439

103

10/20/87

Dear Mr. Vecchia:

Please recommend Camel Back and the Adobe Badlands for BLM designated wilderness areas.

These two sites are precious for recreation, fragile ecosystems, watersheds and archeological sites. Only four percent
68 of Colorado is still wilderness and
136 a mere one third of this land has been recommended for protection by BLM. There are no resource conflicts in these two areas, so recommending them would be asking a minimal favor. Any support you can offer in this direction will be greatly appreciated.

Also, I would like to thank BLM for recommending the Gunnison Gorge as protected wilderness. Since I live in that area of Colorado and know the beauty of it, I am greatly appreciative. Thank you for your time and consideration.

Sincerely,
L. Yall Stein
L. Yall Stein
704 N. Blvd.
Gunnison, CO
81230

104

OCTOBER 15, 1987
PETE SCHERTZ
ASR 21
GARDNER, CO 81040

GENE VECCHIA - RMP TEAM LEADER
BUREAU OF LAND MANAGEMENT
2505 S. TOWNSEND AVE.
MONTROSE, CO 81401

DEAR MR. VECCHIA:

I HAVE RECENTLY BEEN INFORMED BY THE COLORADO ENVIRONMENTAL COALITION THAT THE CAMEL BACK AND ADOBE BADLANDS AREAS HAVE BEEN DISREGARDED FOR PROTECTION AS WILDERNESS AREAS. I CONGRATULATE YOU FOR THE RECOMMENDATION OF THE GUNNISON GORGE AREA AND I URGE YOU TO PLEASE NOT STOP THERE.

68
136 I AM NOT REQUESTING THIS FOR THE STATE'S BENEFIT OF TOURISM, OR SO THAT MYSELF AND OTHERS WILL HAVE ANOTHER PLAYGROUND. CHANCES

104

68
136 ARE GOOD I WILL NEVER EVEN VISIT CAMEL BACK NOR ADOBELANDS. I AM REQUESTING THIS BECAUSE I BELIEVE THAT WILDERNESS REMAINING WILDERNESS IS A GOOD ENOUGH REASON IN AND OF ITSELF. IT NEEDS HAVE NO POSITIVE BENEFIT TO MAN TO JUSTIFY ITS PRESERVATION; ALTHOUGH, WITHOUT MOST OF US REALIZING IT, ITS PRESERVATION IS THE GREATEST BENEFIT WE CAN EVER RECIEVE FROM IT.

SINCERELY,
Peter Schertz

105

Dear Mr. Vecchia,

I am writing you in support of the wilderness designation of the Gunnison Gorge and Adobe Badland areas. I spent a month on a paleontological survey in Fruita, Colo. that was taken away from the Uranium miners and given to the scientists by the BLM. I have seen the merits of this decision first hand. These areas are rich in archaeological and
68 paleontological artifacts in addition to Mountain Lion dens, Elk habitats, etc. Please preserve these areas that are so rich in specimens from the past and present for the future. Once again, I applaud your handling of the Fruita Paleontology Area and count on your repeating this action in regard to the Gunnison Gorge and Adobe Badland Areas, increasing your impressive record of decisions.

Sincerely,
Mark W. Hamrick
Univ. of Colo.
138 Arnett Hall
Boulder, Co.
80310

10-21-87
106

Dear Gene Vecchia

I am writing to you in regard to three poposed wilderness areas in the Montrose area that fall under B.L.M. juristiction. To wit: Gunnison Gorge, Camel Back, and Adobe Bad Lands.

First, I would like to thank the B.L.M. for recommending the entire 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Thanx.

Second, I ask the B.L.M. to reconsider its non-recomendation of Camel Back. I do not understand why, even after B.L.M studies show there to be no resource conflicts with wilderness designation of the area, B.L.M.
136 has not recomended Camel Back. It is time that the Uncompahgre Plateau, one of the landforms of Western Colorado, be given at least this small piece of wilderness designation. Why has the B.L.M. failed to do so.

Finally, it is beyond reasonable belief that the Adobe Bad Lands has been left out of the B.L.M. pro-wilderness recomendations. Why was this decission made?

68 As a Colorado native who is deeply concerned with the future of our state, I ask you in

106

68 the strongest terms possible to please reconsider and include both Camel Back and Adobe Bad Lands in your pro-wilderness recommendations.—

Please respond.

Sincerely,

Carl Will
P.O. Box 182
Gardner, Colorado
81040

Phone 746-2275

10/22/87 107

Gene Vecchia,

I am very concerned about some recent BLM proposals. Although I want to thank you for recommending 21,038 acres of Gunnison Gorge for wilderness protection, I am concerned that Camel Back and Adobe Badlands were not recommended for similar status.

136 Camel Back is part of the Uncompahgre Plateau, which is a major landform in western Colorado lacking any designated wilderness. Furthermore, several endangered species exist on Camel Back and would benefit from wilderness designation. Camel Back is also one of few places left on the plateau which is a potential wilderness. The

68 Adobe Badlands should also be designated as wilderness since the conflicts with wilderness designation are nonexistant.

69 Another issue I am concerned about is the Storm King Ski Area Site on the north end of Cimmaron ridge. This land is critical for elk calving and mule deer fawning. Allowing the Ski area developers 5 years to proceed with the ski area seems like very irresponsible management. Please support the elk on Storm King Mountain instead of the Ski Area developers.

Thank You,
Suzanne Fairchild

108

Dear Mr. Vecchia,

This Letter is written to voice my opposition to further encroachment on BLM land. In Particular, I am concerned about BLM recommendations concerning the Camel Back and Adobe Badlands.

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136 Since there are less than 10% of all Colorado wilderness lands now protected from further incursion, I protest further recommendations which would allow development of these vital wildland and wildlife refuges.

Please recommend Adobe Badlands, Camel Back, and all of Gunnison Gorge for wilderness designation.

Thank you,

Sincerely,

Tom Keyes

109

Dear Mr. Vecchia,

I recently found that you approved Gunnison Gorge WSA for Wilderness Protection. Excellent. BUT, I also heard that your organization has failed to recomend the Camel Back (Roubideau Canyon) and the Adobe Badlands for Wilderness protection. This disturbs me. How can you say that a small amount of resources is more important than the long range goal of protecting the wilderness, the diverse eco-systems, and many endangered species of plant and animal which inhabit the Wilderness Study Areas. Please don't use short-sightedness in your planning - only 4% of the land in Colorado is wilderness, don't let it dwindle away. Please Approve these two WSA's for Protection

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Thank You.
David Rubin

BETTY NICKERSON ELWELL
P. O. BOX 522
LA VETA, COLO. 81055

Oct. 21, 1987

To Gene Vecchia,
Dear Mr. Vecchia,

This letter is to give my support for the BLM to add Camel Back and
68 136 Adobe Badlands to their recommended Gunnison Gorge for wilderness protection. We cannot afford to lose any more of our endangered species.

I am very much against the development of the Stone King Ski Area. Colo. has an oversupply of ski areas that are having a
69 difficult time being solvent. To develope another and thereby eliminating an essential elk habitat is very short sighted. Please keep the elk for my great-great grand children to see.

Sincerely,
Betty Elwell

Date: Oct 23, 87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Dale Hall

Signed:

DELTA VETERINARY CLINIC

DR. TOM GORE
Office: 874-7598
1520 Bluff St.
Delta, CO 81416
After Hours: 874-3927 or 874-4672

RECEIVED MONTROSE OCT 27 1987 BLM COLO.

United States Department of the Interior
Bureau of Land Management
Montrose District Office
2465 South Townsend Avenue
Montrose, Colorado 81401

To Whom It May Concern,

These are my written comments on the Uncompahgre Basin Resource Management Plan, Environmental Impact Statement, and Camel Back Wilderness Study Area. I am in favor of the Current Management Alternative for the Uncompahgre Basin. I am in favor of the No Wilderness Alternative for the Camel Back Wilderness Study
136 Area. The current system for this area has served everyone very well by utilizing the Multiple Use Concept of Public Land Management. As a current radio commercial says, "If it ain't broke, then don't fix it."

I am also advocating restriction of Off-Road Vehicles (ORVs) to be used only on designated roads in the entire Uncompahgre Basin District. The reasons for these restrictions are 1) ORVs cause
67 increased stress and harassment of wildlife on a year-around basis, 2) ORVs do not try to avoid vegetation, but instead drive over grasses, bushes, and shrubs, which leads to their destruction that then causes, 3) increased soil erosion.

My final opinion is a very general idea. I am a recreational user of BLM administered lands. I believe all recreational users of public lands should be charged a day-fee or a yearly users-fee. Historically, other users of public lands such as grazing, lumber, and mining interests have been charged fees for their use of the public domain. To me, it is an inconsistant policy that allows hunters, fisherpersons, and/or perusers of scenery to be
65 given a "free ride". As a businessman, I have learned that if anything is given away it is not appreciated, but if something is charged for it is more likely to be used properly and taken care of. I have many times used National Parks and National Recreation Areas where the fee system was in effect. I think people tend to pick-up after themselves more and appreciate what they use when they are charged a fee. Those who use it should pay for it. Finally, a major source of revenue to support and improve public lands is being neglected and left totally untapped by not charging users fees to recreationists.

Thank you.
M. Thomas Gore, DVM
M. Thomas Gore, D.V.M.
1365 Bluff St.
Delta, CO 81416
1-303-874-5190

Dear Sirs; October 20 1987

I am writing this letter to you about The Uncompahgre Wilderness Resource Management Plan. It is important that you include several Wilderness Areas within your Plan, namely the areas known as GUNNISON GORGE, CAMEL BACK (ROUBIDEAU
68 136 CANYON) and ADOBE BADLANDS The inclusion of these lands constitute only 42,000 acres with the entire area of 1,235,000 acres within your jurisdiction, which is a mere 6% of the total.

Although I live on the EASTERN SLOPE of Colorado, it is valuable to me that land remains in its pristine and natural conditions on the WESTERN SLOPE. Land remaining undisturbed on the EASTERN SLOPE is growing less accessible by every passing year, more visitors are making their impact on these remaining lands, and the distance and time necessary to reach truly untouched wilderness is also expanding. I do not have the possibility to enjoy the wilderness as often as I would like (which ideally would be every weekend); instead I find it necessary to compromise and take only a few longer outings each year. I donot believe that I am unusual for the type of person who lives in the growing metropolitan areas of the Eastern Slope, who finds enjoyment and recreation in experiencing the outdoor activities of fishing, hunting, camping, hiking, cross-country skiing, etc.

I realize that there are other interests vested in these lands which the local inhabitants of the WESTERN SLOPE are actively engaged in for their livelihood. I envy them for their lifestyles. However I only plead that some lands remain accessible in the lands under your jurisdiction, so that city folks like me can get out and relax from time to time

Thank you for your consideration: Carl von Ohlsen

114

Dear Sir;

What makes Colorado a diverse and wonderful state? What is the number one industry in Colorado? What is this states most precious recourse. The answers are ~~to~~ beautiful wilderness land, which draws tourist by the millions to wonderful Colorado. Now don't you think the maintenace of our natural land are indeed your ~~of~~ number one priority.

In perticular I feel you should recommend Camel Back and Adobe Badlands in the Uncompahgre Basin as designation wilderness area. I don't think this is asking too much. Why, because millions of people love to enjoy our Wild America. And by designating these areas as wilderness you will help proctect the quality of water and proctect the diverse plant and animal life of South Colorado. And also you will be proserving these lands for millions to enjoy. Thank you J. Zevalking

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October 20, 1987 115

Dear Gene Vecchia,

I am writing in response to the wilderness recommendations for the three desert roadless areas encompassed in the Uncompahgre Basin Resource Management Plan.

I would like to thank you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection, but I do not quite understand the opposing issues of the other two areas.

I would urge BLM to recommend Camel Back for wilderness designation. There are no resource conflicts, timber or even mineral conflicts with the area. Importantly, there are many endangered species of plants that exist which would benefit from wilderness designation.

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I would also urge BLM to recommend Adobe Badlands for wilderness. The badlands provide sweeping vistas of the San Juan Mountains and the Uncompahgre River

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valley and are home to an endangered species of cactus. There is obviously no timber, and of the oil and gas wells drilled near Adobe Badlands, there has been no indication of potential sitings for minerals.

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The conflicts with wilderness designation are essentially non-existent, and BLM offers no explainations for its non-wilderness recommendation. I am anxiously awaiting a response, so I can understand BLM's decisions

Thank You

Lynda Poff

Lynda Poff
708 Youngs Rd
Phillipsburg, NJ.
08865

116

October 22, 19

Dear Gene Vecchia,

I would like to tell you how glad I felt when I heard the BLM has designated the Gunnison Gorge Wilderness Study Area for wilderness protection. I thank you very much for that. However, I was concerned when the BLM did not recommend Camel Back & Adobe Badlands for wilderness protection.

I don't understand why Camel Back has not been designated a Wilderness Area, this area does not involve any timber or mineral conflicts, so whats the problem? The BLM has already stated that they want to cut back on grazing, just in case. Why let the land slowly deteriote, stop it from happening, designate as a Wilderness Area

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As far as Adobe Badlands go, whats the problem? Gas & oils exploration turned up empty, and obviously there is no timber available. This land also contains a couple of endangered species of Cactus.

These areas offer no economical values, but the value of these lands lye in ~~their~~ thier inherent beauty and solitude, something that cannot be replaced once it is destroyed. So please, urge the BLM to designate both Camel Back & Adobe Badlands as Wilderness Areas. I thank you for your reconsideration.

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Sincerely,
Marv Kriewaldt

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Jessica Wachtel
500 30th St.
Darley South #607
Boulder, CO 80310

Dear Sir:

I am a CU Boulder student writing to you out of concern for Colorado wilderness. I would like to begin by thanking you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection.

136 I would like to ask you to recommend to the BLM that they give Camel Back a wilderness designation. BLM has admitted that there are no resource conflicts within designating the 10,402 acres a wilderness area.

68 In addition, 10,425 acres called the Adobe Badlands is in need of a wilderness designation. Within these badlands exists an endangered species of cactus, providing evidence of a further need for the designation beyond its pristine existence.

Thank you for your time.

Sincerely,

Jessica Wachtel

118

Oct. 20, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I am writing concerning the recent Uncompahgre Basin Resource Management Plan. I understand the RMP covers 483,000 acres of public lands, 42,000 of which are part of a wilderness study area.

Let me express my appreciation for your recommendation of the Gunnison Gorge WSA for designation as a wilderness. I was disappointed to learn, however, that the Camel Back and Adobe Badlands WSA's were not

68 136 included in this recommendation. After considering the lack of conflicting uses for these two areas, as well as the very small percentage of the area of the Uncompahgre Basin they represent, I urge you to include the Camel Back and Adobe Badlands WSA's in your recommendation that the Gunnison Gorge receive protection as a wilderness area. Your careful consideration of this matter is appreciated.

Thank you, David Ownby

119

Gene Vecchia
BLM
Montrose, Colorado

9/25/87
1934 South Broadway
Grand Junction, Co 81503

Dear Mr Vecchia,

Thanks so much for the recent BLM decision to recommend Gunnison Gorge for wilderness protection! Many of my friends have fished and/or floated the gorge. As yet, I have had a chance to do neither___I'm glad I still may have the chance.

Please, please, give the same recommendation for Camel Back, and the Adobe Badlands. There doesn't seem to be any resource conflict with either one becoming wilderness, however, it is my understanding that the current management plan for Camel Back:

1) recognizes no resource conflicts
2) intends to decrease grazing in order to protect riparian habitat
3) intends to allow wilderness qualities to be gradually destroyed

despite the ever increasing number of people who value wilderness per se as a resource, (and, once destroyed, is nonrenewable!) So much of the

68 136 Uncompahgre Plateau has been managed for various other interest groups, that Camel Back is one of the few potential wilderness areas left on the Plateau. As one of the major land forms in western Colorado, there ought to be some small corner kept as wilderness. How can you explain such a nonsensical approach to management of a vanishing resource like wilderness?

And, again, why not recommend the Adobe Badlands for wilderness designation? There the current BLM management plan is to close it to OHV's. The four dry oil and gas wells drilled in the vicinity seem to indicate a low mineral resource potential___certainly the timber people have no interest in the area! Conflicts with wilderness designation seem to be non-existant and yet, inexplicably, this too was not recommended for wilderness designation! Why not?

Surely, you will not be surprised that I also oppose the 5 year grace period under consideration for the (hopeful) developers of the ski area at Storm King. In 5 years, they will have been able to destroy the CRITICAL elk calving habitat. Critical habitat means, sir, that if you take it away, you take away the whole elk herd which traditionally has

69 used it. Mule deer fawning areas would also be compromised. After 5

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69 years of grace for the developers, the damage will already be done! Please, manage Storm King Mountain for the elk and the deer, not for millionaire ski area developers whose quality of living will in no way be affected whether they build this particular ski area or not.

People vacation here from all over the world, few of us are so lucky--to be able to live here year round. Lets not lose sight of that which makes this a desirable place to be, that which sets our part of the planet apart from all others! Lets not sell it all into nonexistence for the sake of a few more skiers dollars, or let its qualities be'gradually destroyed'. Please accept the responsibility to manage with an eye for the future, that there will continue to be something worth managing, that we and our children may continue to enjoy this country and the pleasures it affords - in perpetuity.

You have my sincere and heartfelt thanks for listening, on my own behalf, and on behalf of my 2 year old daughter, whose entire nap time I have spent in writing to you.

Penelope Crocker

Penelope Crocker

copies:

Wm. Armstrong
Tim Wirth
Ben Nighthorse Campbell
Roy Romer
Margaret Masson
Bob DeNier
Allen Kisterke

Oct 19, 87

Dear Mr. Vecchia:

I was surprised and saddened to hear of the wilderness study areas that have not been designated as Wilderness Areas. Since those areas in total represent such a small area of total BLM lands it seems ~~a~~ a small favor to ask that more of our land be set aside to maintain genetic diversity, for further anthropological study, and dinnosaur research.

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~~Essay~~ Camel Back contains several rare plant species and by your admission there are no resource conflicts. Please set this land aside as Wilderness. Adobe Badlands are another area which have a pristine ~~area~~ beauty and views. Also Beaver Creek, one of the lower elevation canyons allows year round recreation so that people can enjoy the beauty which has made the west famous.

With only 4% of Colorado left pristine it seems a mistake to go any further in Endangering our heritage and the environment we depend on.

Thank you for recomending Gunnison Gorge, I hope you can do the same with the other areas I've mentioned with a little further consideration and thoughts towards future generations.

Thank you for your time.

Sincerely,

Margot Smit

MARGOT SMIT
1001 Marion St. #2
Denver Colo. 80102

To:
Gene Vecchia
RMP Team Leader
BLM
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Gene,

I would first like to voice my approval for the recommendation given by the BLM for wilderness protection in the Gunnison Gorge.

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The Camel Back and Adobe Badlands are wilderness study areas which I feel have much to recommend them also. Very little land in these lower elevations is protected by wilderness status even though these areas have a variety of plant and wildlife species not found in the high altitude areas. There are no resource conflicts or special interests in these areas however thier wilderness qualities will be gradually destroyed without full protection. The areas being considered are such a small percentage of BLM land that as much as possible should be set aside now.

Cordially
S.J. Clark
S.J. Clark

Mr Vecchia,

Thank you for recommending Gunnison Gorge for Wilderness. This was quite appropriate.

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However, in the DEIS there were no reasons listed for recommending the Adobe Badlands and Camel Back for Wilderness. Indeed, the DEIS read like, an argument for such designation. There arent even any industies interested in the area. Also, Colorado has many, many alternative areas for ORV. My friends and I who enjoy using ORV facilities do not want to cause ecological harm and hope that such trails have been carefully considered for those uses. Please recommend Camel Back and Adobe Badlands for Wilderness Designation.

69
In addition, the development of Storm King Mountain for skiing would be catastrophic for elk calving. This is an extremely important issue. During many ski seasons there isn't even enough snow to support a ski area. Even initial exploratory development would prove irreversibly damaging to these elk. Wildlife is an important facet of the maintaining the beauty of Colorado.

Thank You,

Scott Hatfield

1155 Marine #208
Boulder Co, 80302

Dear Gene Vecchia,

First of all I would like To Thank You (BLM) for recommending all 21,038 acres of the Gunnison Gorge wilderness Study Area for ~~its~~ wilderness protection.

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I would like To ask you and The BLM To recommend The Camel Back and The Adobe Badlands for wilderness designation. These areas have No timber or mineral conflicts, so all the more reason not to develope but To protect these ~~areas~~ wilderness

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areas. Also manage Storm King Montain for elk and not ski area developers.

Thank you

Scott Robison

124

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.' Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed: Gary W Cooper
10/28/87

125

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 136 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed: Gary W Cooper
10/28/87

126

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO., 810401

October 23, 1987

Dear Mr Vecchia,

I was very pleased to see that the BLM has recommended the Gunnison Gorge WSA as wilderness in the Uncompaghre Basin RMP.
The area is quite beautiful, and the Gunnison river running through it, makes it a very unique area.

Unfortunately, you neglected to recommend two other fine areas, with all the characteristics established in the 1968 Wilderness Act, as identifing wilderness, Camel Back WSA and Adobe Badlands.

136 Camel Back WSA contains wonderful, colorful sandstone formations, on the NE side of the Uncompagre Plateau. It seems like quite an oversight not to have as of yet, recommended any area of one of the major landforms in the State! Several species of endangered plants exist in Camel Back WSA, as well as big game herds. I certainly hope the the BLM will reconsider the non-wilderness recommendation for Camel Back especially in light of the fact that no major conflict with a wilderness designation exists.

68 I was also sorry to see the Adobe Badlands not recommended for wilderness. It is home to the endangerd cactus Uinta Basin, and provides a great view of the rimver valley and the San Juan Mountains. It appears to have a low potential for oil or gas, and no timber conflicts whatsoever. I could not find a good rational in the RMP for not designating this area wilderness.

I hope that the BLM will have the forsight to see that our unique qualities of wilderness in our beautiful state will be the mainstay of Colorado's future economy, as more and more of North America is developed, and Colorado is a haven to escape back to the wilderness.

Sincerely,
Laurie Thayer
Laurie Thayer
2212 Mapleton Rd.
Boulder, CO., 80302

127

2405 S. TOWNSEND AVE.
MONTROSE, CO

RECEIVED MONTROSE OCT 30 1987 BLM COLO

OCT 24 1987

DEAR BLM,

68 136 A FRIEND JUST INFORMED ME THAT CAMEL BACK AND ADOBE BADLANDS WSAs WERE NOT RECOMMENDED FOR WILDERNESS DESIGNATION. I AM FAMILIAR WITH BOTH AREAS (I REMEMBER RECORDING AN ARCHAEOLOGICAL SITE IN THE BADLANDS AREA THAT DATED TO PALEO INDIAN TIMES -- OVER 8,000 YEARS OLD! THAT AREA IS SO UNIQUE - FEELS SORT OF LIKE THE OLDAVAI GORGE OF WESTERN COLORADO!) AND FAIL TO UNDERSTAND THE REASONING BEHIND DROPPING THOSE AREAS. I DON'T REMEMBER THERE BEING ANY PARTICULARLY SUCCESSFUL OIL OR GAS WELLS BEING DRILLED IN EITHER AREA. PLEASE RECONSIDER YOUR DECISION

I'D LIKE TO THANK YOU FOR RECOMMENDING THE GUNNISON GORGE W.S.A; ALL OF US WHO LOVE THE GUNNISON RIVER AND THE INCREDIBLE CANYONS IT FLOWS THROUGH (INCLUDING US FISHERPEOPLE) APPRECIATE YOUR DECISION. THANK YOU!

SINCERELY,
Sarah M Crum

October 27, 1987

From: Dave Hamilton
Box 531
LaVeta, Co. 81055

To: Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO. 81401

Dear Mr. Vecchia,

This letter thanking the Bureau of Land Management for recommending the Gunnison Gorge Wilderness Study Area for wilderness protection. It will be a beautiful addition to the Black Canyon of the Gunnison.

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Would the Bureau of Land Management also take under consideration Camel Back and Adobe Bad lands for protection under wilderness also? We need more area for protection (sq. mi.) and enjoyment in a natural state. A day hike in these areas will touch the soul of an individual to feel a part of a true earthly creation.

Page 2 -

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please try to resolve the conflicts and put these other two areas under protection. We will need them in the future.

69
One, not so small, other matter, the King Ski area site. As you know the LaVeta, Cuchara area has a ski area of its own on forest land. I protested this area as I do the Storm King area for the sake of elk calving. Now that the elk are no longer calving in this area, the state forest fertilized the entire Mt. Range this spring by helicopter to encourage the tundra to grow and the elk to come back. This will not happen and the state is unhappy about loss revenue from hunting.

Another sore spot, due to the drop in skiers, the ski area went belly-up and is now operated by F.D.I.C. Now ski management is looking for some poor soul to take a beating on lift tickets, while the big boys do land swaps with the Forest Service in order to build more condo's. Developers are looking for prime real estate, not to be in the ski business.

We need more wilderness so I can continue to live in Colorado, my home state.

Page

Thank-you Mr. Vecchia for your time and I do hope and pray that a solution to let B.L.M. land for wilderness can be found.

Sincerely,
Dave Hamilton
Box 531
LaVeta, Co. 81055.
303-742-3641

HENRY G. WRIGHT
ATTORNEY AT LAW
1911 MAIN AVENUE
P.O. BOX 2312
DURANGO, COLORADO 81302

(303) 259-3202

October 29 1987

Robert Vecchia
BLM
2505 S. Townsend Ave.
Montrose CO 81401

Dear Robert:

I wish to comment upon the RMP recently issued by your office. I personally have visited tha lands covered by the RMP on a very regular basis, and have also visited each of the WSAs a number of times as well.

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I would urge the BLM to reconsider its preferred alternative so as to mora closely follow the Conservation Alternative. The nagative impact of grazing is just to severe for the arid and simi-arid land to handle. The results of overgrazing are all too clear in a number of places in the area. I am especially concerned about the proposed land treatment as suct "treatment" has a severe impact upon the natural vegetation and is of limited value so far as actually increasing forage.

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So far as the WSAs are concerned, the BLM is to be congratu-ated upon its All Wilderness proposal for the Gunnison Gorge. However, the BLM should also include both the Camel Back and Adobe Badlands area as wilderness. It would appear from the reports that wilderness desigantion would not in any way influence either grazing or mineral extraction. Both areas offer pristine country which should be preserved. The Camel Back area offers one of the last undisturbed areas of the Uncompahgre Plateau while the Adobe Hills area offers a great expanse of Mancos Shale which provides numerous opprortunites for solitude.

Thank you for considering my comments. Please keep me in touch as to your final decision.

Sincerely,

Henry G. Wright
Attorney at Law

HGW/ps

130

Oct. 20, 1987
2512 Mapleton Apt B
Boulder, CO 80302

Gene Vecchia
RMP Team Leader
BLM
2505 S. Townsend Av
Montrose CO 81401

Dear Sirs
I am aware of the current interest in Gunnison Gorge, Camel Back (Roubideau Canyon), and Adobe Badlands. I am concerned about the future of these areas. I appreciate the BLM recommendation of Gunison Gorge for wilderness
protection. Camel Back and Adobe Badlands should also be desgnated wilderness.
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For myself, my children and future generation we should take care of these few remaining beautiful and important areas. Wildlife including big game, and rare and endangered species, Certain cacti species are of great concern to me.
I would also like to voice my opinion about
69 the site proposal of Storm King Ski Area. Not enough snow here - save it for the Elk and those that can really live there.

Thank you very much for reading this and your time invested.

Yours,

Eric Reische
Student CU - Boulder

131

Kerry Whitford
337 Libby Hall
Boulder, CO.
80310

Dear Gene Vecchia,
I'd like to deeply thank BLM for their recommendation of Gunnison Gorge area for wilderness protection. However, I'd like to ask for the recommendation of Camel Back and Adobe Badlands for wilderness protection also. The amount of wilderness study areas is only 8% of all of BLM's lands (in the state). Also only a third of the 8% is being recommended for wilderness protection. I feel that asking for the protection of these other two areas
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is a humble request. I understand that the need for resource developement is important, however so is the need for conservation and change in our country's consumption habits. We must stop destroying these pristine and rare areas through the draining of the lands resources, and focus our efforts more on conservation. These areas are not only symbols of our nations heritage and hold many sights for archeological study, but also are great areas for recreation, scientific research and protection of the nations depleating water sheds and wildlife. Please, I urge the BLM to protect these last, few pristine areas for the enjoyment of future generations.

Sincerely,

Kerry Whitford.

Margaret Orijo 132
2621 59.00 Rd
Olathe, Co. 81425
Oct. 30, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, Co. 81401

Dear Mr. Vecchia
I commend the Bureau's recommendation to include the Gunnison Gorge Wilderness study area for wilderness protection. It's a step in the right direction. Thanks!

Now from the stand point of continuing on this course other areas such as Camel Back + Adobe Badlands should also be under this protection. Your own studies appear to indicate there's no conflicting interests or none that can't be resolved. This being the case action must taken now before these areas are destroyed to the
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point of no return, so to speak.
It is my understanding there are many requirements for an area to be designated for Wilderness protection. If these things are destroyed while trying to decide what to include for Wilderness Protection they are most likely gone forever. Action must be taken before this can happen. Thanks for your attention in this matter.

Sincerely
Margaret

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) ~~do not~~ agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68
136
The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed:

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan And Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86
Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

What else is there to say? The above says it all

Signed:

5555 East Yale, Apt. 3
Denver, Colorado 80222
October 31, 1987

Robert E. Vecchia, RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia;

During the past several weeks, I have had the opportunity of reviewing the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement. I appreciate the opportunity provided to make written comments concerning it.

68
136
I am pleased that the Gunnison Gorge WSA is recommended as suitable for wilderness designation in the Preferred Alternative. The Camel Back WSA and the Adobe Badlands WSA should also be so designated. I could find no convincing argument presented for not doing so. There is a great need for preserving wilderness areas in our great country and every effort should be made to do so while the opportunity remains.

The designations for Escalante Canyon and for Fairview should be for the greatest possible protection of the endangered, threatened, candidate, and sensitive plant and animal species and for the unique plant associations found there. Careful and adequate monitoring must be maintained to insure that these species are indeed protected.

67
I would favor the maximum closed and limited use designations for ORV use which would give the most protection for endangered, threatened, candidate, and sensitive plant species. I would hope that this issue is given careful consideration before the Final Plan is adopted.

85
The Conservation Alternative seems to present a more acceptable land tenure adjustment with no public lands being considered for disposal and for pursuing acquisition of some private lands. It should not be necessary to lose habitat for endangered, threatened, candidate, and sensitive plant species by disposing of those lands.

122
Every possible means should be taken to protect the cultural and paleontological resources in the planning area. These are resources that are invaluable and once destroyed are lost to scientific study forever.

Thank you again for this opportunity to make comments.

Sincerely,
Eleanor Von Bargen
Eleanor Von Bargen

Rodney Wilson
214 N. Washington
Cortez, CO 81321
November 2, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I'm writing to express my appreciation for the BLM's decision to recommend Gunnison Gorge for wilderness protection. The great fishing and beautiful scenery of this area should rightly be preserved as a wilderness area. While this action by the BLM warrants my appreciation, I would like to express my regrets at your omission of recommendations for Camel Back and Adobe Badlands.

136
Camel Back, as one of the few remaining potential wilderness area on the Uncompahgre Plateau, deserves your recommendation for wilderness designation. The endangered species of plants which exist in the area would benefit from wilderness designation, as would the big game population. As there are no timber or mineral conflicts to interfere with the designation, please reconsider your recommendation.

68
The Adobe Badlands, with its beautiful views of the San Juan Mountains and the Uncompahgre River valley, also should be recommended for wilderness designation. With a low potential for mineral and no timber, there are no obvious conflicts with a wilderness designation. I understand that you intend to close the area to off-road vehicle use so why not go one step further and recommend for wilderness protection.

69
One other issue in the Uncompahgre Basin RMP is the Storm King Ski Area site. Your plan says the ski area would eliminate the elk calving habitat and impact mule deer fawning areas. Despite this, the BLM intends to let developers proceed with the ski area during a 5 year grace period. Please do not destroy this area for the sake of some private developers. Wilderness and wildlife are shrinking resources that must be preserved.

I realize that you must consider many conflicting interests in making your recommendation but please reconsider recommending Camel Back and Adobe Badlands as wilderness areas and stopping the destruction of an elk calving habitat.

Sincerely yours,

Rodney Wilson

OCT 31, 1987 137

Dear Mr. Vecchia,

As a representative of the Bureau I address my comments to you.

I am very appreciative of the Bureau's wilderness protection recommendation of the Gunnison Gorge area. The fact the you and I live in such beautiful country makes this recommendation a very important sign of common interest. Thank you for your help in this work.

68 The Camel Back country as well as the Adobe Badlands also need your wilderness support. The information contained in the draft Uncompahgre Basin RMP leads me to the conclusion that these areas have no
136 competion from timber/mineral interests. The question, then, is why doesn't BLM recommend wilderness designation for Camel Back and Adobe Badlands? The Uncompahgre Plateau will continue to be ruined unless you support at least one spot, the Camel Back, for wilderness protection.

Please take my comments into serious consideration. I think our future together on the western slope depends on us working together.

Thanks
Patrick Muckleroy (98 FAIRWAY DR
GUNNISON, CO 81230)

138

Michael G. Figgs
2635 Appleton Ave. 77
Boulder, CO 80302

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Ave.
Montrose, CO 81401

Sir,

I have reviewed the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement, and the Wilderness Technical Supplement. I commend you for your fine efforts.

136 Although there appear to be no major resource conflicts with the designation of the Camel Back Wilderness Study Area as wilderness, I could not find in the above documents the rationale for your not recommending the WSA as suitable for wilderness. I would request that this issue be addressed in the Final Environmental Impact Statement.

I visisted the Camel Back WSA and surrounding region in July of 1986, and was impressed with the rugged landscape and opportunities for solitude. It is an excellent area for wilderness day hiking in a canyon country setting, all the more enjoyable since it is close to populated areas and is easily accessable.

I believe that the Camel Back WSA is suitable for wilderness designation, and encourage you to reexamine decision.

Thank you for the opportunity to comment.

Sincerely,
Michael G. Figgs
Michael G. Figgs

Date: 11-2-87 139

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I [redacted] (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
136 No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

We do not need any more land put aside just for so-called "environmentalists" to take over and try to keep the people who really love our open spaces off from it.

People who spend any time out there know that the people who want all wilderness areas are the ones who pack trash in and leave it. Guides & outfitters are the ones who pack the trash out.

Signed: Kal Deutsch

Shirley Deutsch

140

Date: 11-2-87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Having been in the guiding business most of my life and around cattle people all my life. the only way to maintain the land for the most profitable for all concerned is to maintain the current management for grazing - wildlife habitat, mineral and forest products and to enhance the recreation of such lands by keeping these ~~intact~~ management intact

Signed: Kal Deutsch

Shirley Deutsch

141

Date: Nov. 3, 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Users getting together with each other and with management can better understand each other's problems and so can better work out solutions for these problems. This is the ~~demo~~ democratic way to do or work out problems that relate to all.

Signed: Melvin K Beach
430-1550 Rd.,
Delta, Colo.

142

Date: Nov. 3, 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I ~~(do)~~ (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.

68 Site-specific objectives can be mitigated through the Allotment Management Plans.

136 More users, including recreational users can use and enjoy these areas if they are not in the All Wilderness Alternative.

Signed: Melvin K Beach
430-1550 Rd,
Delta, Colo.

143

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I ~~(do)~~ (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.

68 Site-specific objectives can be mitigated through the Allotment Management Plans.

136

Myles Standish Box 248 Olathe Colo 81425
Harold Hubbard Box 206 Olathe, Colo 81425
Lorna Hubbard Box 161 Olathe, Colo 81425
Grey Standish Box 248 Olathe 81425

Signed:

144

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Myles Standish Box 248 Olathe Colo 81425
Harold Hubbard Box 206 Olathe, Colo 81425
Lorna Hubbard Box 161 Olathe, Colo 81425
Grey Standish Box 248 Olathe 81425

Signed:

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I [redacted] (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68
136 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Michael Goodman — Olathe, Co
[illegible] F. Enoch — Montrose, Colo
Rick Gilliam — Grand Jct, Co.
Maxine Davis — Olathe, Co
[illegible] Davis — Olathe Co
Rick Goss — Olathe Co.
David B Smith — Montrose, Co.
Alice Goodman — Olathe, Co
Fred Goodman — Olathe
Rita Goss — Olathe
Freda [illegible] — Olathe Co
[illegible] — [illegible]

Signed:

Larry Sanders — Delta Colo
Ken Nelson — Delta, Co
Roy [illegible] — [illegible]

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Michael Goodman — Olathe Co
[illegible] F. Enoch — Montrose Colo
Rick Gilliam — Grand Jct, Co.
Maxine Davis — Olathe, CO
[illegible] Davis — Olathe Co
Rick Goss — Olathe Co
David B Smith — Montrose, Co.
Alice Goodman — Olathe, Co
[illegible] — Delta Colorado
Larry Sanders — Delta Colo.
Ken Nelson — Delta, Colo
Roy Nelson — Delta Colo

Signed:

Date: November 3, 1987

Bill Campbell
8100 - 25 Mesa R.
Delta, Colorado

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68
136 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

64 If this area were to turn wilderness, it would in most cases adversely affect the grazing status on certain allotments. Most small livestock producers will not be able to operate if their cattle numbers are reduced. Our nations food supply of beef will depend upon the wise decisions made now.

68
136 The alternatives are best suited for "No wilderness" of the Camel Back and Adobe Badlands. We are truly concerned about this area's quality of life and the economy now and in the future.

Signed: Bill Campbell

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

We would like to submit our comments on the Uncompahgre Basin RMP/EIS and the Wilderness Technical Supplement. First of all, we would like to commend you on the job you have done. It took alot of research and study and hard work to put these documents together and I know it would be impossible to please everyone.

121
136 Basically, we are against the Camel Back area being Wilderness and feel the 35% utilization in the riparian areas would hinder our utilization of the entire permit. The riparian zones are our primary source of stock water for our BLM permit and if we couldn't use those areas for watering, we couldn't use the out-lying areas as well. We would need additional water sources, such as catchments and ponds, especially on Hunter Mesa, and if it were designated as Wilderness, we wouldn't be able to get these facilities. The Roubideau Canyon has remained virtually unchanged for many years and I feel it will continue that way without the Wilderness designation.

Thank you for your cooperation and listening to us all.

Signed:

Sincerely,

Linda & Larry Boyd

149

Date:

Robert E. Yecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Yecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 136 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed: Frank + Tony Espil

Date:

Robert E. Yecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Yecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

66 I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

68 136 Please do not put the "Camel Back" into the All Wilderness Alternative. We feel its use would not be in the best interest of those involved. We do not think it would even be appreciated for anything more than the current use.

Signed: Margene Oswald - 625 Poppy Way - Broomfield, Co. 80020
Llewellyn Oswald - 625 Poppy Way - Broomfield, Co 80020

151

Date:

Robert E. Yecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Yecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.' Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Please enter my support of the "Continuation of Current Management" concerning the Uncompahgre Basin Resource Management. We feel this land should definitely be left to multiple-use.
Thank you

Signed: Margene Oswald - 625 Poppy Way - Broomfield, Co. 80020
Llewellyn Oswald - 625 Poppy Way - Broomfield, Co 80020

152

1740-2725 Road
Cedaredge, CO 81413
November 2, 1987

Robert E. Yecchia
RMP Team Leader-BLM
2505 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Yecchia,

In the absence of what I view to be compelling argument for substantial change, I favor a continuation of the present management of land under BLM control; I favor the "Continuation of Current Management" alternative.

Comments about the specific land uses addressed:

121 Riparian Zones--I do not see in the "Plan" sufficient documentation presented to justify elimination of 3500 acres from livestock use. I understand that in one instance this action will create particular hardship for one rancning operation. I do not believe that this should be done without strong evidence of the need for such action.

66 Wilderness Designation--Based on the arguments I have heard and read, I do not find sufficient reason for a 68 change in status of any of the three proposed areas. 136

Access--For those of us who own land and operate in the vicinity of the BLM lands, the idea of establishing public access roads is a real concern. Our experiences have shown that an access is treated by especially the hunting and wood cutting public as license to use any of the lands they cross. I doubt that the BLM envisions a sufficient increase in staff to police such accesses which again leaves the very painful task to the individual landowner. 9
As a concept I oppose access roads without the appropriate controls; in the event of a decision to create such accesses, I would hope that they will be selected so as to create a minimum of hardship to landowners.

Thankyou for the opportunity to comment on your proposals.

Sincerely,
Harry B. Vaughn
Harry B. Vaughn

153

2184 Stonehenge Circle
Lafayette, Colorado 80026
Nov.1, 1987

Dear Sirs:

We are writing to inform you of our support in protecting the following Colorado Desert Wilderness Areas currently under consideration.

We thank you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Area for protection. This land is prime wilderness and is tied in with both the Black Canyon and Gunnison River which are so important for preservation.

136 On the Gamel Back area of the Uncompahgre Plateau, we want an explanation to your approach on managing this wilderness resource.By your own admission, there are no resource conflicts in regards to wilderness designation. We strongly feel that the BLM should support Wilderness Designation for this area as none of this Uncompahgre Plateau has a single acre of wilderness as yet.

68 As far as the Adobe Badlands are concerned, we appreciate your decision to close the area to off-road vehicle use. We realize that there is virtually no resource to utilize here. so we see no conflict in declaring wilderness designation for this area.

69 And one more thing; even though we are avid skiers, we do not support the potential Storm King Ski Area site. As it is critical elk calving habitat and would impact deer terrain as well the fact that there are more than enough ski areas in all parts of the State of Colorado. we implore that the BLM manage Storm King Mountain for elk and not ski developers.

Thank you for your time.

Sincerely,

Laura & Ray Wynfield

Laura & Ray Wynfield

154

Date: Nov. 4-1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed: Laura J. Wells - 6515-5300 Rd - Olathe Colo.
Thomas D Wells - 6515-5300 Rd - Olathe Colo 81425
Carri Lou Wells - P.O. Box 27 - Olathe, Colo. 81425

155

Date: Nov 4 - 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (~~do~~ ~~not~~) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Gamel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
86 No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
136 Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed: Laura J. Wells - 6515-5300 Rd. Olathe, Colo. 81425
Thomas D Wells - 6515-5300 Road - Olathe Colo.
Carri Lou Wells - P.O. Box 27, Olathe, Colo. 81425

156

701 650 Road
Delta, Colorado 81416
November 1, 1987

Mr. Robert E. Vecchia, RMP Leader
Bureau of Land Management
2505 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

The personnel in the Montrose office of the BLM have spent considerable time and effort on the Draft RMP/EIS for the Uncompahgre Basin Resource Area and I want to commend them for the quality of the document. It is too bad that only a comparatively small number of the citizenry of the United States, most of whom have never been this area, have demanded this study which required a great deal of time and money that could have been used for some worthwhile endeavor.

I think the study team for making the right decision on the Gamel Back WSA and the Adobe Badlands WSA. we already have too many of these areas set aside, and we are over a hundred years too late to have real wilderness areas. As far as the Gunnison Gorge is concerned, it is already too well advertised to be of any value as a so called wilderness. However, it seems unnecessary to reduce the livestock grazing in these areas that are showing improvement under present grazing conditions.

121 Throughout the Draft RMP/EIS, the riparian zones are to be "limited to 35 percent utilization of key forage species and eliminated from March.1 through May 31", for livestock grazing. Why not use the lower elevation stream areas in the spring when livestock use would invigorate the willows along the stream banks? Anytime a stream in a desert area is excluded from livestock use, the riparian zone will deteriorate. If livestock are excluded from any area, the big game will move out of that same area. The two ungulates seem to need each other.

133 As far as putting a percentage of use on so called "key species", I challenge this idea. There is no such thing as a "key species". This is just a cliche used by some to make an impression on the layman. No plant species is more of a key than is any other species. As far as percentage of utilization, this is another thing that is very questionable. It would be more practical to classify use as light, moderate or heavy. This makes more sense since no one knows what 100 percent vegetation by weight was, or is, in any given area before any grazing occure.

134 In the more than 50 years since the passage of the Taylor Grazing Act, there has generally been a continual reduction of livestock numbers over the whole area of the Uncompahgre Basin Resource Area. If by proposed management, as set forth in this RMP/EIS,we are going to see as much improvement, then the next reduction of livestock use has been to no avail. Why not change and get out of the "reduction rut" and try something such as the Holistic Resource Management. This is being proven to be advantageous in other areas.

Concerning the endangered species and livestock use, the endangered species have survived more than a century of livestock use and are still here. Maybe these species need livestock or large ungulates in order to propagate, but due to people pressure, there will never again be populations of big game animals large enough to take the place of livestock.

While I am not well acquainted with the whole Uncompahgre Basin Resource Area, I am very familiar with the Escalante Canyon area and, to a lesser degree, with the Roubideau Canyon. I visited the lower Roubideau Canyon recently and was very impressed with the improved conditions that have taken place in the area over the past eight years. The vegetative cover in both areas has shown great improvement in recent years which proves that the present management is working there. Let's not change a plan that is proven to be beneficial. I see no reason for restriction nor reduction of livestock use in either area.

There are more than 175 permitted livestock users in the Uncompahgre Basin Resource Area. These users are spending many thousands of dollars of their own money trying to improve these public lands. This money is over and above their grazing fees, and this shows that these people are the real conservationists. They are doing something to make their area a better place.

65 98 I believe that everyone wants the same thing, to improve the resource area, and if we all work together there is no telling what can be accomplished. Why not have the recreationist pay to use the public land and why not have the DOW pay a grazing fee?

In closing, let me remind everyone that in this area where the greatest percent of the land area is public land, the ranchers depend upon the continued use of these public lands, but to an even greater extent, the wildlife are dependent upon the livestock use and the feed and privacy offered by the private lands.

Sincerely,

Jack Musser

Jack Musser

701 650 Road
Delta, CO 81416

November 2, 1987

Mr. Robert E. Vecchia, RMP Team Leader
Bureau of Land Management--Uncompahgre Basin Resource Area
2505 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

Please find enclosed an article by Heather Smith Thomas, which was recently published in the 1987 Livestock Buyers Guide & Catalogue, a joint publication of: THE LIVESTOCK JOURNAL, TEXAS FARM AND RANCH NEWS, AND THE RECORD STOCKMAN.

This article gives new insite into the livestock versus wildlife problem, and we feel it is worth consideration by the RMP team.

Thank you for your work as the RMP team leader.

Sincerely,

Bernice Musser

Bernice Musser

enclosure

News article available for review at BLM office.

6324 Powell Road
Parker, Colo 80134
Nov 2, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
Montrose, Colo. 81401

Dear Mr Vecchia,

I would like to comment on the draft of the Uncompahgre Basin Resource Management Plan.

I support wilderness designation for the three areas covered in the plan. I commend the BLM for recommending wilderness for 21,038 acres of the Gunnison Gorge wilderness study area. This area contains 13 miles of the Gunnison River which have been recommended for designation as a wild river. I urge the BLM to also include Camel Back (Roubideau Canyon) and Adobe Bidlands in the final resource as suitable for wilderness designation.

136 The Camel Back WSA contains 7 miles of perennial Roubideau creek as it cut an 800 foot deep canyon through colorful sandstone formations. This area is one of the few remaining roadless areas left on the Uncompahgre Plateau. Several endangered species of plants exist in the area which would benifit from wilderness designation, as would big game herds.

68 The Adobe Badlands consist of 10,425 acres of Mancos shale badlands north of Delta. They provide sweeping vistas of the San Juan mountains and the Uncompahgre River valley and are home to an endangered cactus (Unta Basin Hookless cactus). I feel this area has a low potential minerals and conflicts

Parker Colo 80134
Nov 2,

68 with wilderness designation are essentially non-existent.

69 I also urge the BLM to manage the storm king site for elk calving and not give ski developers a five-year grace period in which to proceed with the ski area. The management plan is supposed to assess compability of resources not give one a head start over the other.

Thank you

Lawrence A. Papp

Lawrence A. Papp

Date: Nov. 3, 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan And Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed:

Date: November 5, 1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (~~do not~~) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Dunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
136 No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Richard and I are true natives of this Area. Our families, for two and three generations before us, evolved their livlihoods in the Camel Back, Winter Mesa, and Roubideau Creek area. It is written in stone in the Roubideau where my great-great Uncle and friends spent Christmas day in 1884. He was a cattle rancher who worked this very area. The last generation saw my great Uncle's brother-in-law homesteading the San Jon love place in the canyon, which is still in our family's ownership. The years of 1920 and 1928 saw my Grandfather, and Richard's Grandfather, building grazing permits in these adjoining areas. (These same permits are still held by our family members or us.) We grew up learning the history of this area from the actual people who first 'settled' it. This Roubideau Canyon shaped their livlihoods, their lives, and their persons. (As it still does ours, today.)

Through our heritage and knowing and living with the majestic beauty, the defiant ruggedness, the severe forces of flooding, and the extremes of weather causes us to truely understand and greatly appreciate this area. It is our home, our 'back yard', and we love it. The Camel Back terrain has defied change for, at least, over a hundred years of'civilization'. And it still demands the same respect and offers the same subjects for appreciation,,,without a title.

We need more water development on the top and benches of Winter Mesa to better manage our entire grazing allotment. There would also be great, long term benefits from draining or blowering and reseeding in the saddle area between Winter and 7% Mesas. The road across the top of Winter Mesa is essential for catchment and fence repairs, and has been necessary for transporting sick and injured livestock. It is heavily used for big game hunting, recreationists, and some Division of Wildlife activities.

With these factors in mind, therefore, our preference is only the No Wilderness Alternative for the Camel Back Wsa.

Thank you for your consideration of these comments.
Signed:

Deborah R. Lee
56450 Iowa Rd.
Olathe, Co. 81425

Date: November 5,1987

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan And Environmental Impact Statement;

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

A few additional comments and concerns are;

We support the Bureau's position to continue your fact-finding process underway for the Stone King elk development. Only when you and those involved can analyse all the facts and impacts can a valid decision be reached. The Uncompahgre Valley could certainly benefit from the diversity of income generated by this. - But our concerns are the same as others', i.e.,Is the area in question now, or historically,a grazing allotment?, and- Will the lack of this elk habitat adversely affect the surrounding area, both on public and private lands?

We also have concerns about off road vehicle use. We support only the Current Management Alternative but there are areas which need to be under more strict restrictions from this activity. -Especially during crucial srcsive periods, and while wildlife is under winter stress.

Throughout the draft are references to introducing desert sheep to the Camel Back area. We object to this proposal. Because: 1. The only reliable water for this area is the Roubideau and Cottonwell creeks. Both are designated riparian zone habitats, and it has been suggested that limiting usage in these zones will improve them. Introducing more animal units to directly conflict with the historical use of cattle grazing and the crucial deer winter range is defeating our range management objectives.2. The revenues 111 derived from the grazing permits and deer hunting activities historically and are now progressive and dependable. This area is presently a study area for mountain lion with no hunting or trapping of them allowed.(Their numbers are increasing.) There are also coyotes there year around, and bear to the South in the summer months. With these obstacles it is certain to take years for the herd (band?) to produce enough trophy-size animals for harvest. The money, time, and man-hours alloted for this could be better spent.

Signed:

continued on next page

Richard M. Lee
56450 Iowa Rd.
Olathe, Co. 81425

page 2. of comments on the BLM Uncompahgre Basin Resource Management Plan And Environmental Impact Statement by Richard and Deborah Lee.

98 With the concerns on hand in association with the Division of Wildlife Agency we have a question:, What percent of the hunting license fees from the DOW are distributed back to each Area's forest service and BLM offices? In the majority, it is the agencies and the livestock permittees who pay for and do improvements on public lands which also benefit all wildlife and hunters.

Our greatest objection throughout the RMP draft comes from the references of limiting utilization in the riparian zones to 35%. First of all, it is not clear if the existing livestock alloted have to share this percentage with the Area's wildlife. Since most, if not all, designated riparian zones are in arid country where other de-
117 sirable water sources are non-existant all wildlife and livestock are forced to use them together. As with any watering area, the grass and livestock will first use the accessable feed nearest the water, as that is tagged off and fouled they will use further away. Most of these riparian zones are in deep canyon bottoms which obviously hampers this natural operation. Therefore, without water on the benches or mesa tops the animals invariably use more than 35% before they even touch the rest of the allotment. Invariably use more than 35% before they even touch the rest of the allotment. Our objective is for better distribution over all. Through the continuation of current Management of range improvements such as stock ponds and catchments we are doing what we can to relieve use in the creek bottoms.-But because of varried rain fall these alternatives are not dependable each year.

We disagree with the problems cited in the riparian zones as being caused by "over grazing". In this arid area the major detrimental effect is water.(Either the lack of, or the excess of.)The extraordinary forces of the spring run-offs and the more damaging flash floods save tons of crucial soil, grasses, woody plants, and even trees each year. It is proven that the time of use in association with the growing season for a particular plant type is one of the limiting factors. The other is water availability for the plant to start healthy growth, and to recover after use. Our bare ranch, at the confluence of Dry Creek and the Dad Creek, was homesteaded in 1895. It has had cattle and horses on it each and every year since then.Our livestock use along these creeks and horses on it each and every year since then.Our livestock use along these creeks from early November through May or June each year. -(We would include the dormant and crucial growing seasons for most plants. (Perhaps the attached photos will be beneficial.)
In our opinion, the difference between our 'private land' riparian zone and that in
121 Roubideau Canyon is not the number of, or even the timing of livestock impact,,,it is surface and sub-surface water availability. (And flooding.) Factors the 35% limitation will have no effect on!

Again, the Continuation of Current Management is the only Alternative we accept.

Thank you for your consideration of these comments.

Deborah R. Lee
56450 Iowa Rd.
Olathe, Colorado 81425

The photos are available for review at the BLM office.

162

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
136 No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

We ~~feel~~ feel that the land is for everyone's use and that stock and wildlife can get along together and a wilderness areas grow up with out anything to eat it and could be bad if a fire got started and you couldn't use fire fighting equipment if they don't take a auto into it. ~~We~~ we would like to see people take care of our forest and the wildlife and plants but we think that all people should have access to all forest. The elderly can walk or ride horses to see all this ~~beauty~~ beauty

Signed:
Lee Tunget
Helen Tunget

163

4700 Venturi Lane
Fort Collins CO 80525
November 1, 1987

Mr. Robert Vecchia, RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

This letter provides my comments on the Draft Resource Management Plan (DRMP) for the Uncompahgre Basin Resource Area. I have made many visits to locations within this Resource Area, and am familiar with the beauty and resources it encompasses.

The Preferred Alternative of the DRMP is inadequate in its attention to the botanical resources of the Resource Area. Although I support the Escalante Canyon ACEC and Fairview RNA, these areas need formal management provisions
28 spelled out in the RMP. Escalante Canyon ACEC should be larger, should allow no livestock grazing, and should prohibit camping. Management intent with respect to utility corridors, roads, mineral exploration, grazing, and surface occupancy should be specifically listed for each SMA. Plant species and vegetation associations considered sensitive by the Colorado Natural
103 Areas Program should be listed for the entire Resource Area, and if appropriate, additional Special Management Areas should be proposed in the final RMP.

27 I oppose the proposed North Delta ORV use area as incompatible with management prescribed by the federal Endangered Species Act for listed plants. Although this area already has suffered damage, that is no excuse for BLM's abdication of its responsibility to preserve the remaining values.

67 Because of their destructive potential on the fragile adobe badlands, I ask that ORVs be restricted to existing roads throughout the area. The Mancos-shale-derived adobes of the Uncompahgre provide a specialized habitat for numerous rare plants and plant associations. It is sad that the short-term pleasure of a few is considered more vital than an irreplaceable resource.

Thank you for recommending the Gunnison Gorge WSA for wilderness protection. It is a spectatular area that, under wilderness designation, will be a valuable supplement to Black Canyon of the Gunnison National Monument.
68 However, nowhere in the DRMP do I find sufficient justification for dropping
136 Adobe Badlands and Camel Rock WSAs from recommendation for wilderness. In view of their wilderness characteristics, I favor a favorable recommendation for both areas.

116 I ask that the final RMP clearly delineate the areas of riparian vegetation within the Resource Area, and list specifically the management plans for

163

-page 2

116 this vegetation type (as a separate unit, not fragmented, hidden, and thus
119 lost within the "Management Unit" format). Such plans should include complete exclusion of livestock grazing from the riparian areas.

Please include my comments in the final RMP, and keep me on your mailing list for information regarding the RMP and Resource Area.

Sincerely yours,

Susan S. Martin
Susan S. Martin, Ph.D.

164

November 4, 1987

Robert E. Vecchia
Bureau of Land Management
2505 South Townsend Avenue
Montrose, CO 81401

Dear Sir:

I am in agreement that the Camel Back should continue to be managed by the BLM as it now is. I prefer the no action alternative.

136 For many years the Multiple Use Act has worked for the preservation of this area. The forage is harvested yearly by wildlife and livestock to help feed the hungry world. At no time have these uses interfered with recreational uses of these lands.

This area does not lend itself to wilderness. There are roads in the area and some fencing. The land is managed as it should be and the area is accessible to the general public.

I was brought up on the theory that Public Lands were for Multiple Use. With proper management, these lands will provide us with food and fibre for all time to come, but we must be allowed to properly manage livestock grazing. Fences must be kept, stock ponds properly maintained and the range properly utilized to prevent over-grazing and forest fires.

Reducing livestock grazing in the so called riparian zones would defeat the purpose of a riparian habitat. Many riparian species of vegetation are of low palatability to livestock. Streambanks in this area are unstable and water turbidity will occur in the absence of livestock use.

121 Many flash floods come down these canyons each year as evidenced by the rocks and sandy washes. These streams usually dry up during the summer and when flooding occurs there is no way to hold the sandy, rocky dry banks. Some areas are definitely too dry for vegetation and definitely does not lend itself to streambank stability.

Reduction of AUMs would defeat the purpose of a riparian zone when properly managed. Vegetation and the canyon areas has improved many times over in the few years since a riparian habitat was first introduced, even though the AUMs have remained the same. Riparian habitat properly managed should increase available forage.

111 Bighorn sheep should not be introduced into the area. Lack of adequate winter forage should preclude this. Private land in the area would, of necessity, have to support these animals especially in the winter months.

It would appear that livestock grazing has been given practically all the credit for increased erosion and for the destruction of habitats of big game and non game species. These statements are biased and founded without fact.

All these natural resources should be utilized thru a practical and beneficial program, not locked up for the exclusive use of hikers, back packers and the affluent few with time on their hands.

The young, too, grow old. They also will be denied access to roadless areas in their declining years when they are no longer able to walk or back pack long distances.

The need to continue Multiple Use menegement of all Public Lands will provide forage for wildlife and livestock, minerals for energy development and protection of watersheds, the most valuable resource of all.

The west has a valid existing right to keep these Public Lands open for all to use and enjoy. Creating wilderness areas does not guarantee these lands for the enjoyment of future generations. Proper management does.

Josephine M. Gere
Josephine M. Gere
445 Hwy 348
Delta, Colorado

7 Chardonnay Court
Grand Junction, CO 81503
3 November 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

I offer the following comments regarding the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Technical Supplement.

1. The document is generally well-written--thorough and without the usual obscurities!

2. BLM's recommendation of wilderness for the Gunnison Gorge is laudable. The gorge is geologically spectacular and offers year-round opportunities for primitive and unconfined recreation.

136 3. There are no resource conflicts with respect to Camel Back, yet BLM has failed to recommend any of the WSA for wilderness designation! On what was this recommendation based?

68 4. Adobe Badlands WSA, as described by BLM on p. 3-11, "includes the most outstanding Mancos shale mass formations found in the planning area" and present no resource conflicts that would preclude wilderness designation. So why was this WSA given a non-wilderness recommendation?

5. The cultural resource density within the Gunnison Gorge WSA comprises at .02Sacre, and the potential for cultural resources is evaluated as "moderate." The cultural resource density within the Camel Back WSA comprises at .01Sacre, and the potential for cultural resources is evaluated as "low to moderate." Please explain the justification for these evaluations and this discrepancy.

71 6. While a site density of .01Sacre may be "low" in some contexts (e.g., south western Colorado), it is not "low" in west-central Colorado. Furthermore, I don't know which 3 percent of the Camel Back WSA has been inventoried, but I am dubious about site-frequency predictions made from such small samples. This area contains three perennial creeks and is topographically similar to the Domingues and Escalante areas, both of which have proven to be extremely archaeologically sensitive.

126 7. It is stated on p. 4-57 that "High-value cultural sites on these acres could be protected by special designations." How?

Gene Vecchia
Bureau of Land Management
p.2

67 8. Having almost 90 percent of the resource area open to ORV use is preposterous! Such non-management of these vehicles encourages ecological degradation, soil erosion, and the destruction of archaeological sites.

69 9. The Storm King Ski Area is NOT NEEDED--the present crop of ski areas can barely make a go of it, so WHY develop another? However, the elk DO NEED their calving grounds, and the deer their fawning areas. No development activity should be allowed during the 5-year grace period proposed by BLM.

Thank you for considering my comments.

Sincerely,

Danni L. Langdon

Danni L. Langdon

23 November 1987

Dear Gene Vecchia,

First I want to thank you for recommending the Gunnison Gorge area for Wilderness designation. It is very important that we preserve intact significant areas of desert ecosystems.

136 I do not understand why you did not recommend the Camel Back area for Wilderness protection as well. The BLM even said that there are absolutely no resource conflicts with wilderness designation of the area. The Uncompahgre Plateau is one of Colorado's major landforms. Yet none of it is protected as Wilderness. I would like to know why. There are several endangered plant species in the area and big game herds that would benefit from wilderness protection.

68 I also want to know why you have chosen not to recommend the Adobe Badlands for Wilderness designation. Obviously there are no trees there for the timber industry, and the four dry oil and gas well prove the low potential for mineral development. There are no significant conflicts for wilderness designation.

69 Please manage Storm King Mountain for elk. There are more than enough ski areas (and I am a skier) in Colorado, and wildlife habitat is an ever-dimishing resource. The BLM says that the ski development would totally eliminate the elk calving grounds as well as impact mule deer fawning areas. The plan to give the developers a five year 'grace period' in which they may proceed with the ski area is ludicrous. After five years of working on the resort, it will be very convenient for you to allow them to continue since they will have put so much money into it. This sounds like a roundabout way to avoid dealing with an issue that needs to be confronted and dealt with now, while we still have undisturbed ecosystems left.

Please don't be afraid to take a stand in favor of protecting the wide-open spaces that make the American West what it is. I would appreciate your response to these issues.

Sincerely,

Susan Detweiler

Susan Detweiler
64 Willard
Boulder, CO 80310

167

2832 Unaweep Avenue
Grand Junction, CO 81503
3 November 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

I would like to make the following comments regarding the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Technical Supplement.

68
136
1. I support BLM's recommendation for wilderness designation for the Gunnison Gorge and I am in favor of similar designations for the Adobe Badlands and Camel Back WSA's. Why, if there are no resource conflicts, has BLM not recommended them for wilderness?

69
2 The Storm King Ski Area is unnecessary; Colorado has enough ski areas, most of which are constantly complaining about their financial struggles.

Thank you.

Sincerely,

Bella Conner

Bella Conner

168

2832 Unaweep Avenue
Grand Junction, CO 81503
3 November 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

I would like to make the following comments regarding the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Technical Supplement.

68
136
1. I support BLM's recommendation for wilderness designation for the Gunnison Gorge. However, I am also in favor of similar designations for the Adobe Badlands and Camel Back WSA's, as this region of Colorado has very few wilderness areas that are accessible during any season but late spring/summer. There are no resource conflicts with respect to Adobe Badlands or Camel Back; why has BLM not recommended them for wilderness?

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2. Please explain why the BLM considers the potential for cultural resources in the Camel Back WSA "low to moderate."

126
3. How would high-value cultural sites be protected by "special designations"?

69
4. The Storm King Ski Area is unnecessary; I urge you to disallow the developers from proceeding with any further plans during the 5-year grace period.

Thank you for considering my comments.

Sincerely,

Carl E. Conner

Carl E. Conner

169

4700 Venturi Lane
Ft. Collins, CO 80525
November 2, 1987

Mr. Robert Vecchia, RMP Team Leader
BLM, Uncompahgre Resource Area
2505 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I wish to comment on the Draft Resource Management Plan for the Uncompahgre Resource Area.

68
136
Please recommend both Adobe Badlands and Camel Back WSAs for potential designation as wilderness. The DRMP gives no good reasons why each of these areas should not be recommended, and clearly describes the loss of wilderness characteristics that will occur if they are not so designated. It makes no sense to allow the few remaining areas still having such characteristics to be degraded. I support the recommendation of Gunnison Gorge for wilderness status, but urge you to include the other two areas.

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119
I ask that the final RMP more clearly list areas of riparian vegetation in the Resource Area, and that highly specific, stringent management provisions be stated for their recovery and continued existence. Among these provisions should be the total exclusion of grazing, which is incompatible with the maintenance of native species in these areas.

27
100
I strongly oppose the draft RMP's plans to allow destruction of federally listed plants. Please modify the final Plan to respect the intent of the Endangered Species Act, and to provide full protection for listed species. The final RMP also should state clearly that no land containing listed species will be considered for exchange or disposal.

67
Please look closely at the draft RMP's extreme imbalance between resource use and resource destruction, caused by proposing virtually unlimited ORV use. Although negative impacts are vastly understated, the DRMP section on Preferred Alternative Impacts nevertheless provides a lengthy list of long-term or irreversible effects due to the proposed ORV provisions. Far more than just 6% of the land in the Resource Area should be permanently closed to ORVs to protect air, water, land, plant and animal resources, and opportunity for non-motorized pleasure and recreation. Please consider the potential effect increased ORV use may have in every Management Unit outlined, and exclude such use from appropriate Units.

Thank you for the opportunity to comment on the draft RMP. Please keep me on your mailing list.

Sincerely,

M. P. Steinkamp

Myrna P. Steinkamp, Ph.D.

170

To whom it may concern;

68
136
First and foremost I would like to congradulate for recommending Gunnison Gorge Wilderness study area for wilderness protection. But, unfortunately, I am unpleased over your decision ~~not to~~ of not recommending Camel back canyon and the adobe Badlands. Please reconsider your decisions. several endangered species exist in this area. There are many other environmental ~~eso~~ factors in this area that you must reconsider. Please do so!

Bryan R. Jones
600 30th Stevens West Rm 425
Boulder, Co 80310

1045 E. 4th Avenue
Durango, CO 81301
November 5, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I am writing you to express my support for additional wilderness recommendations by the BLM in the Uncompahgre Basin Resource Management Plan.

I'd like to thank you for recommending wilderness designation for the Gunnieon Gorge WSA in the draft RMP. As I'm certain you know, this area contains a significant diversity of recreational and scenic resources worthy of preservation.

There are two additional WSAs, Adobe Badlands and Camel Back, that I believe deserve wilderness designation and should receive BLM recommendations for such designation in the final RMP.

There are few landforms more obviously meeting wilderness criteria than the Mancos ehale badlands typified by the Adobe Badlands WSA. Although this area has relatively easy access, little interest has been shown in extractive development. With
68 no resource conflict and management plans expressed in the draft RMP to close the area to off-road-vehicle use, wilderness designation is an obvious and proper route for preservation of the area.

Likewise, there are no resource conflicts in the Camel Back WSA. As one of the few remaining areas of true wilderness on the Uncompahgre Plateau, this area merits protection as a component of the National Wilderness Preservation System. A majestic
136 canyon system with a perennial stream, Camel Back can provide a remote recreational experience for the backcountry hiker, and wilderness designation would provide protection for fragile riparian habitat and rare plant species in the unit.

I urge you to reconsider your position on Adobe Badlands and Camel Back and recommend those areas, in addition to the Gunnison Gorge, for wilderness designation.

Sincerely,

[signature]

Lewis McCool

November 2nd 1987

Dear Mr Vecchia:

First, let me state that this letter is not submitted too respectfully, for my head is aching from my attempt at deciphering the Uncompahgre Basin RMP. But I do have a few comments and questions

(1) Wilderness / ORV's – talked about skewed management. Why is it so tough to designate 9% of your planning area
68
136 as wilderness? Is 4% your idea of a compromise? The fact that out of your entire planning area, only 3 WSA's emerged was the compromise – don't throw any more wild land to the ORV's, etc. I hardly consider the policy (in the prefered alt.) of allowing ORV's open
67 access to 82% of the planning area wise management – they destroy everything they come into contact with. Give other recreationists a break from these noisy, pollution belching monsters.

(2) Why do you refer to chaining as wildlife habitat management? (p 4-49) The wildlife was doing fine before we came along;
110 coexisting with the pinyon-juniper, you might say. If the areas you plan on chaining were suited for grass, it would be growing there already.

(3) Land Disposal – Did I miss something? Why? Why? Why? Some of the tracts you have marked for disposal are of considerable size, so management difficulties can't explain it all. At one point you
85 state that the BLM will be disposing of 10,000 acres of crucial winter range for

85 deer and elk, and that this will have a negative impact on these animals. Then you state that you will be acquiring crucial deer & elk winter range to increase habitat (p 4-53) This is just one example that I hope illustrates the reason for my confusion over your land policy. Once again, what for?

In summary, I would like to see more emphasis on protection of our land & its living components. Also, what's this baloney about a ski area?

Sincerely,
Kathy Hands
Box 241
Boulder CO 80306

October 30, 1987

Dear Gene Vecchia,

I am excited that you have recommended Gunnison Gorge for wilderness protection, also but I am disappointed you have decided against doing the same for Camel Back and Adobe Badlands. Camel Back's 10,402 acres of wilderness propose no conflicts pertaining to timber, mineral, or resources, and it contains important, unique areas such as Roubideau Creek and
68
136 Uncompahgre Plateau, and this area also is the home several endangered species of plants. Also, the 10,425 acres of wilderness in the Adobe Badlands contain the beautiful San Juan Mountains and the Uncompahgre River Valley and home of endangered cactus. All of this land deserves to be designated as protected wilderness and I hope BLM's reverses its decision on Camel Back and Adobe Badlands.

Thank you for your time,

Anne K. Ellegood
619 Marine St. #1
Boulder, CO 80302

RESPONSES TO PUBLIC COMMENTS

Table 3 presents the BLM's responses to comments submitted during the public comment period. The response numbers correspond to the numbers on the margins of the hearing transcripts and comment letters. The commenter or letter numbers correspond to the numbers on the upper right corner of each page of the hearing transcripts and comment letters and identify the individual commenter (see Table 1 and Table 2).

Responses are arranged by resource or resource use. Responses explain why a particular issue was or was not addressed, clarify the BLM's position on some issues, state whether a text change was made, and refer the reader to applicable sections of this document or the Draft RMP/EIS. The responses must be read in conjunction with the appropriate comments.

Table 3
RESPONSES TO PUBLIC COMMENTS

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
		AIR QUALITY
58	31	There is a pervasive misconception that recommendation and designation of new wilderness areas is automatically tied to restrictive federal Prevention of Significant Deterioration (PSD) Class I air quality status. There is no such connection. Certain existing national parks and wilderness areas were designated as mandatory Class I areas by Congress in the 1977 Clean Air Act Amendments, but since then each state is and has been responsible for any redesignation. Since 1977, several areas in Colorado have been designated as wilderness but none have been redesignated as PSD Class I. The state of Colorado identifies air quality areas as Category I, II, and III; the sulfur dioxide limitations in the state categories are identical to those established for federal PSD Class I, II, and III areas. In 1977, the Gunnison Gorge Recreation Area was designated a Colorado Category I area; it remains a federal PSD Class II area.
		COAL
31	16, L-21	The development of thresholds was considered as required by 43 CFR 1610.4-4(i); however, since all of the coal in this area is to be extracted using underground mining methods and since mitigation has been built into the management prescriptions and no major adverse impacts are anticipated, the establishment of thresholds was not deemed necessary.
32	16	Under the Continuation of Current Management Alternative, only emergency short-term lease applications and maintenance leases would be considered. The average increases under the other alternatives allow for consideration of future long-term leasing of lands with coal potential. The land-use planning groundwork presented in this plan will enable the BLM to respond more quickly and efficiently and avoid frequent amendments to the RMP if there is a future demand for coal. It also provides industry with a variety of coal qualities with which to meet future market needs.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
33	8, 16, L-21	A summary of the application of the coal unsuitability criteria is described in Chapter One, pages 9 and 10, of the Draft RMP/EIS. As stated in the cover letter (the first page of the Draft RMP/EIS) and again on page 1-8, the coal unsuitability report is available for public review and comment. This report describes in detail the lands in the Paonia/Somerset coal planning area and a portion of the Bookcliffs coal planning area which are deemed unsuitable based on the 20 unsuitability criteria.
34	L-2	The management of the lands around the Tomahawk Mine has been changed in the Proposed Plan. These lands are now included in Management Unit 7. (See plan map.)
42	16, 22, H-3, L-21	The acreages available for coal leasing consideration do not vary much between alternatives since all mining would occur underground. There were no multiple-use trade-offs or resource conflicts that prevented lands from being considered as suitable for coal leasing.
45	16, L-21	The final regulations regarding increased emphasis on the six criteria mentioned were not finalized until December 1987, six months after the release of the Draft RMP/EIS. These criteria were, however, analyzed in the Draft RMP/EIS. Riparian areas are protected in Management Units D-9 and D-11. The other criteria (sole source aquifers, wetlands, Class I air quality areas, and buffer zones around National Park Service areas) were not addressed because there were no impacts to them or, as in the case of reclaimability, the impacts will be analyzed when a potential coal lease tract is delineated.
46	16, L-21, M-12	The RMP does not make any coal leasing proposals. Coal leasing levels are established by the Secretary of the Interior through the regional coal teams (43 CFR 3420.2). The RMP does analyze the four coal screens described on page 1-9 and identifies whether the coal is available for coal leasing consideration. If there is a demand for coal in the future, coal within the areas identified as available for coal leasing consideration will be analyzed on a tract-specific basis. The BLM cannot lease coal for which there is no industry interest.
72	L-21	The coal leasing process includes a detailed site-specific analysis of potential impacts of proposed lease tracts following tract delineation. Mitigation to eliminate or lessen anticipated impacts is identified at that time. Mining or associated activities would not be permitted where it is known that ground or surface water impacts would result. The BLM recognizes, however, that some degree of risk and the occurrence of unanticipated impacts does exist.
		OIL AND GAS
8	17, 32	This information is contained in the Oil and Gas Technical Report which supports the RMP and which is available for public review. By not making the Oil and Gas Technical Report a part of the RMP (i.e., an appendix), it can be updated and revised without amending the entire RMP.
35	3	The text on page 2-3 of the Draft RM/EIS has been changed. See the Changes to the Draft RMP/EIS section of this document.
38	2, 9	The effects of aquifer mixing are not discussed because of the low level of oil and gas activity. In addition, the immediate and long-term impacts on water resources are not significant because measures are taken at the drilling stage to prevent aquifer mixing and other groundwater impacts on a site-specific basis.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
44	8	The oil and gas resources in Management Unit D-9 would be open to leasing with standard lease terms as described on page 3-29 of the Draft RMP/EIS. In addition, a more comprehensive analysis of oil and gas activities is included in the Oil and Gas Technical Report, which is available for public review as stated in the cover letter to the Draft RMP/EIS.
47	16, 24, L-21	The Connors vs. Burford decision pertained to the leasing of lands in the National Forest system and not to public lands administered by the BLM. The BLM feels that a comprehensive and cumulative analysis of oil and gas activities is discussed in the RMP/EIS and also in the Oil and Gas Technical Report. As stated in the cover letter and on page 1-8 of the Draft RMP/EIS, the Oil and Gas Technical Report is available for public review.
		OTHER MINERALS
36	9	The statement is correct. The mineral leasing process is conducted in such a way that the risks of water injury are minimized. It is the responsibility of the lessee or claimant to mitigate any injury to an adjudicated water right.
39	2	Current policy does not permit mining and disposal of mineral materials in floodplains if the floodplains will be adversely affected. There is no criteria used to permit this activity on alluvial valley floors. Mining on alluvial valley floors is regulated only for coal mining, not disposal of mineral materials. If there are proposals for disposal or mining of mineral materials on alluvial valley floors, they will be analyzed on a site-specific basis to assure all impacts are mitigated.
41	22	Management of this area allows for low but evident human concentrations and impacts. Mineral exploration and development is not in conflict with this management guidance and does not, therefore, necessitate maintaining the existing mineral withdrawal.
43	18	The mineral resources (including production figures) were identified in greater detail in narrative and overlay formats in the Management Situation Analysis (MSA). As stated on page 1-8, the MSA is available for public review and comment. Information from the MSA was condensed and summarized for inclusion in the Draft RMP/EIS. As indicated in the environmental impacts section (Chapter Four) of the Draft RMP/EIS, the Preferred Alternative presented little or no impacts to mineral development, especially for high potential minerals.
		SOILS AND WATER RESOURCES
73	8	When reviewing site-specific actions, the BLM will comply with state water quality standards as noted in the introduction to each alternative prescription.
74	8	Existing water quality standards are established by the State of Colorado, not the BLM. Information on these standards is available at the BLM's Montrose District Office. The amount of data available precluded incorporation into the RMP/EIS. The BLM does monitor water quality on public land to ensure compliance with established standards. This information is also available at the Montrose District Office.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
75	8	The BLM has a representative on the Colorado Non-Point Source Advisory Committee which is currently developing the Section 319 Assessment Report. When completed, this report will identify non-point sources on public land. The specifics of Section 319 program projects will be incorporated into BLM activity plans. Salinity and sediment, the two primary water source issues addressed in this RMP/EIS, are also discussed in the 1986 Colorado 305(b) Assessment Report.
76	8	Site-specific monitoring is a follow-up process for objectives identified in activity plans. As activity plans are developed, monitoring studies designed to evaluate progress in attaining specific objectives will be developed.
77	8	"Local surface waters" refers to the water resources within the drainage where the impact is occurring.
78	8	Domestic water users of water from public land were contacted during the preparation of the Draft RMP/EIS. No water quality problems, potential impacting activities, or water quality improvement needs were identified.
79	8	Aquatic habitat activity plans would be designed to meet or exceed the water quality standards for each particular area.
80	8	The assumption is that AMP objectives for increased ground cover would be met, even if adjustments to the grazing systems are required. The text in the Proposed Plan reflects this assumption.
81	8	The BLM administers the public land under numerous Acts, Executive Orders, Secretarial Orders, etc. The BLM feels erosion and water quality can be improved through proper management without the need for on-the-ground erosion control projects. Each of the alternatives was designed to comply with existing laws and regulations. The impacts that are identified on pages 4-44 through 4-60 are often based on a worst-case scenario; they are not proposed management directions, which are identified in Chapter Three.
82	8	Impacts to aquifers are discussed in each alternative prescription under a section called Impacts to Water Resources from Locatable Minerals. See pages 4-4, 4-14, 4-30, and 4-39 of the Draft RMP/EIS.
83	9	Watershed protection for the Gunnison River through the Gunnison Gorge is identical in both the Conservation and Preferred alternatives.
		RIPARIAN/AQUATIC SYSTEMS
7	9, H-7	The 200 AUM reduction is not a management action but rather the impact on livestock grazing that would result from limiting forage utilization in the riparian management unit to 35 percent. The intent of the restrictions on forage utilization and spring period grazing is to enhance recovery of woody vegetation and reduce soil compaction and bank damage during the wet, spring season.
23	8	The figures used on page 4-53 of the Draft RMP/EIS are actually impacts to aquatic habitat from other uses, and are not the result of the prescription for Management Unit D-9. The 70 miles recommended for intensive management includes the 40 miles in Management Unit D-9 along with additional miles that would be improved or protected through intensive grazing management and other actions.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
24	8, 9, 23, L-21	The 1,034-acre figure in Table 2-5 (page 2-8 of the Draft RMP/EIS) describes the actual existing riparian vegetation within the planning area. The 6,320 acres in the Preferred Alternative and other figures used in other alternatives reflect acres that would be managed for riparian improvement. This includes areas without existing riparian vegetation.
40	20	Current withdrawals do not restrict sales of mineral materials or mineral leasing. Revocation of the withdrawals would open the lands to mineral location under the 1872 Mining Laws. The BLM feels that current laws and regulations provide sufficient means to allow mining and still protect water quality and stream hydrology.
97	1	The numbers appearing after the stream names (e.g., Gunnison River No. 3) are the identifiers used by the Colorado Division of Wildlife for specific sections of a given stream.
113	30	Although there has been some improvement in stream bank cover in some areas over the past 10 to 20 years BLM data does not indicate this improvement is widespread or that optimum conditions would be obtainedunder the continuation of current Management Activities.
114	30	The BLM recognises that differences exist within and between riparian areas. Specific management objectivities and guidelines would be developed in Allotment Management Plans or other activity plans.
116	23, 163, 169	Riparian vegetation in the planning area generally exists as small, isolated areas along stream channels; the size of these areas precludes identification at the 1:200,000 scale of the RMP maps. Those areas which have the highest potential for improvement were identified in Management Unit D-9; management in these areas would be geared for riparian improvement. Other riparian areas would be either maintained or improved under the Preferred Alternative even though they are not identified individually.
117	161	The 35 percent utilization limit proposed in the Draft RMP/EIS would be the upper limit for livestock utilization only. There is no evidence at present to indicate that big game animals concentrate in, or make substantial use of, woody riparian vegetation within the planning area. The greatest concentration of animals occurs during the winter months; however, snow cover reduces big game dependence on free water sources, and animals do not concentrate in riparian areas. Improved water sources on the bench areas would improve wildlife habitat and distribution during the warmer months, but most of these sources would be frozen during the winter.
118	8	The management of riparian areas as described in each of the alternative prescriptions conforms to BLM's riparian policy, EO 11988, and EO 11990. None of these policies or Executive Orders exclude all negative impacts to riparian vegetation or aquatic habitat. Public lands are managed by the BLM for a variety of uses which, in most cases, can be compatible with appropriate stipulations. Specific objectives for improvement would be incorporated into new or existing activity plans after the Record of Decision for this plan is completed.
119	9, 16, 23, 163, 169, L-21	The restrictions the BLM is recommending are anticipated to result in riparian improvement. Monitoring studies would be utilized to determine if additional restrictions are needed.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
121	11, 12, 30, 148, 152, 156, 161, 164, M-1, M-3, M-5, M-6, M-14, M-15	The term riparian is defined on page A-39 of the Draft RMP/EIS. Year-round surface water is not necessary to maintain healthy riparian vegetation. In the Proposed Plan, the limit of 35 percent utilization would be used when other methods of improving riparian vegetation have been unsuccessful. The BLM has a substantial amount of information which supports even more severe restrictions than those in the Proposed Plan. However, based on the current conditions of the riparian areas, it is felt that substantial improvement would be obtained through other methods (i.e., changing season-of-use) and that a 35 percent utilization limit would be implemented only if necessary.
		THREATENED AND ENDANGERED SPECIES
11	7	Table 2-6 and Table 2-8 have been changed (see the Changes to the Draft RMP/EIS section in this document).
27	8, 9, 16, 23, 163, 169	The text has been changed; see the prescription for Management Unit 8 in this document.
99	7	The U.S. Fish and Wildlife Service would be consulted prior to any surface disturbance or the deveopment of any activity plan which may effect listed species or their habitat.
100	9, 23, 169	Tracts with known populations of threatened and endangered species are no longer identified as suitable for further consideration for disposal. All tracts would be inventoried for listed, candidate, and sensitive species prior to being offered for disposal.
103	9, 23, 163	The BLM consulted with the Colorado Natural Areas program throughout the development of the Draft RMP/EIS. Table 2-6 (page 2-10 of the Draft RMP/EIS) identifies all protected species known to occur within the planning area. *Astragalus wetherillii* has been added to Table 2-6 (see the Changes to the Draft RMP/EIS section of this document). All of the species listed on Table 2-6 are also on the State list. There were no other areas of public land identified for special protection within the planning area.
104	9, 16, L-21	A pre-disturbance clearance is conducted prior to the authorization of any surface-disturbing activity and occupied habitat is avoided. Monitoring studies designed to monitor long-term population trends and to detect impacts from livestock grazing and ORV use have been established in several areas.
105	M-3	Some species of cacti, such as prickly pear, can be spread by livestock use. Available data does not show that the spineless hedgehog cactus is benefitted by livestock grazing in any way.
106	30	Based on the objectives of the Conservation Alternative, maximum protection was afforded the special plant resources in this management unit. In addition to the federally-listed plant species occurring in this area, the management unit was designed to afford protection for unique plant associations which are grazed by livestock and are readily accessible.
135	23	The protective measures mentioned on page 3-2 of the Draft RMP/EIS do extend to BLM sensitive species. They do not extend to State sensitive species or plant associations unless these species are included in the Colorado BLM's sensitive species list.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
		WILDLIFE HABITAT
29	L-21	Timber harvesting in this area would be designed to improve elk calving habitat. These design features could include season of harvest, increasing the rotation age, and harvesting to increase small openings in dense stands.
96	34	The badlands areas are not suitable habitat for bighorn sheep.
98	156, 161	Requiring the Colorado Division of Wldlife to pay grazing fees is an issue which goes beyond the scope and purpose of this RMP. At present, the BLM does not receive a percentage of the State's hunting license fees. However, the BLM has received contributed funds from the Colorado DOW for cooperative project work to improve wildlife habitat on public lands. These funds are derived from license fees and have amounted to a considerable sum statewide. We agree that wildlife do receive spin-off benefits from some range improvement projects funded by the BLM and grazing permittees.
107	M-12	Present conflicts for forage between livestock and wintering big game are isolated. The Preferred Alternative allocates additional forage to wildlife in most of those areas where conflicts between private interests and wintering big game are occurring.
109	9	The BLM recently inventoried Fruitland Mesa for sage grouse strutting and wintering areas. The Colorado Division of Wildlife has been, and would continue to be, consulted prior to any habitat modification. The present sage grouse population is too small to be considered suitable for hunting and the available habitat is so limited that little can be done to increase the population. Under the Preferred Alternative, every effort would be made to maintain the present sage grouse population.
110	172	Many areas which were once available for big game use have been converted to other uses, such as agricultural and residential developments. With less habitat available on private land, it becomes necessary to selectively open up some closed pinyon-juniper stands to provide more forage on public land, especially in wintering areas. Prior to removal of the pinyon-juniper, the needs of other species using the area are identified so that system diversity can be maintained or improved.
111	21, 161, 164, M-15	Prior to reintroduction of desert bighorn sheep into the Camel Back area, a site-specific environmental analysis which would identify potential impacts would be completed. The reintroduction of desert bighorn sheep into similar habitat in Dominguez Canyon in 1983 has not resulted in detectable conflicts with livestock, big game, or riparian vegetation. Although bighorn sheep would use the streams as water sources, they would not remain in those areas where dense vegetation inhibits their ability to recognize predators and hazards.
		LIVESTOCK GRAZING
26	30	The text has been changed; see the prescription for Management Unit 12 in this document. The Preferred Alternative (page 3-30, Draft RMP/EIS) also provides guidance for livestock grazing management.
70	20, 34, H-6	Public land administered by the BLM is managed for multiple-use. Livestock grazing is a legitimate use of public land and can be managed to avoid detrimental effects on sensitive areas. Under the Preferred Alternative, livestock grazing would

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
		be limited to 35 percent utilization and the season of use would be restricted. ORV use and other surface-disturbing activities would also be restricted to improve watershed conditions. The BLM anticipates that both soil and vegetation conditions would improve as a result of the implementation of these measures.
127	H-2	AUMs were estimated to increase by one percent per year for 10 years for impact analysis purposes only. This assumes that land treatments and more intensive grazing systems would be successfully implemented.
128	1	Livestock grazing is already restricted around most developments and facilities. The BLM would be willing to work with the Bureau of Reclamation (BOR) in adjusting or restricting livestock use where the BOR has identified adverse impacts from grazing on developments or facilities.
129	129	The BLM's livestock management program is designed to eliminate overgrazing and to improve vegetation condition. The Preferred Alternative would accomplish this through improved management, facility development, and land treatments designed to improve forage condition. Studies have shown a substantial increase in forage species' vigor and density following successful land treatment projects.
131	21	The decreases in AUMs in the Camel Back and Adobe Badlands WSAs are not proposed reductions; rather, this is the anticipated impact resulting from the 35 percent utilization restriction that is a part of the management precriptions for the riparian and salinity areas.
132	30	Under the Conservation Alternative, livestock grazing and drifting would be completely eliminated in the Escalante Canyon RNA, Management Unit C-2. However, this would not preclude trailing of cattle on the Escalante Canyon road.
133	30, 156	Percent utilization is the amount—based on weight rather than height or appearance—of a plant's current growth which has been removed. Key species are those plants that, because of their importance, are monitored to evaluate whether objectives are being met.
134	156, M-6	Reductions mentioned in the Draft RMP/EIS reflect estimates under worst-case situations and are for impact analysis purposes only. Actual adjustments would be determined through long-term monitoring in accordance with grazing regulations. The BLM's philosophy for proper range management incorporates range management principles and various systems or philosophies, such as holistic resource management, where appropriate.
		RECREATION AND VISUAL RESOURCES
12	25, H-5, H-8, H-10	These concerns have been addressed in the Addition to the Gunnison Gorge Recreation Area Management Plan.
50	1	Table 2-16 (page 2-19 of the Draft RMP/EIS) has been changed to include the proposed Curecanti National Recreation Area. The Fruitgrowers and Paonia areas will be evaluated for scenic quality and visual sensitivity when the BLM revises its visual resources inventory.
53	9	As stated on page 1-8 of the Draft RMP/EIS, additional background information concerning recreational use is available in the Management Situation Analysis. The only adequate information the BLM has on actual recreation use is for

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
		the Gunnison Gorge. All other recreation use is estimated from staff observations and from recreation users' comments.
59	24	The management prescription for part of Management Unit D-4 (15,610 acres) calls for a minimum of restrictions on surface-disturbing activities. The remainder of the unit (25,182 acres) would be managed for low but evident human concentrations and impacts. Leasing for oil and gas is not in conflict with this management guidance and, therefore, does not necessitate closing the area to leasing.
65	112, 156, M-2, M-3	The BLM may charge a user fee for recreational use of the public land if a permit system is in effect. Normally, a permit system would be considered only in a Special Recreation Management Area, such as the Gunnison Gorge, and not in extensive recreation areas. Costs of implementing and enforcing a fee system throughout the planning area could be prohibitive.
69	14, 16, 22, 36, 37, 38, 41, 42, 44, 45, 46, 48, 52, 53, 54, 56, 57, 58, 60, 62, 64, 66, 67, 68, 71, 73, 74, 76, 77, 81, 91, 95, 97, 98, 107, 110, 119, 122, 123, 128, 130, 136, 153, 158, 161, 165, 166, 167, 168, 172, H-8, H-10, H-11, H-12, L-5, L-8, L-9, L-11, L-13, L-14, L-16, L-17, L-18, L-21, M-4, M-7, M-8, M-12	The management prescription for Management Unit D-10 of the Preferred Alternative has been rewritten for the Proposed Plan (see Management Unit 10 in this document). The new prescription reflects management of the unit to enhance its use as an elk calving area. Specific interim management related to the potential ski area proposal has been deleted; the public lands within the unit would therefore be managed for extensive recreational use as indicated on page 3-30 of the Draft RMP/EIS. At present, information available on the potential ski area is insufficient to determine its compatibility with wildlife habitat, timber production, and coal production. Should a completed and final ski area plan be proposed, it would be considered in light of this plan's Record of Decision, resource conditions, and other pertinent factors existing at the time the proposal is submitted.
120	22	Under the Preferred Alternative, management direction for this area would emphasize elk calving. It was assumed all impacts to elk calving use from ski area development would be mitigated prior to approval of the ski area proposal.
		OFF-ROAD VEHICLES
6	50, H-2	The expense involved prohibited the inclusion of large, detailed ORV maps in the Draft RMP/EIS. It was felt that the smaller maps in Appendix G would serve to indicate potential problems from ORV proposals. More detailed maps were available upon request (see page A-21, Draft RMP/EIS). The Preferred Alternative recommends more acres for limited ORV use, based on the need to reduce impacts on soils, vegetation, and wildlife.
55	64	The regulations governing ORV use on public lands are contained in 43 CFR 8340.
67	9, 11, 16, 23, 24, 30, 34, 50, 64, 112, 135, 161, 163, 165, 169, 172, H-2, L-21, M-2, M-13	The BLM recognizes ORV use as a valid recreational use of the public land. Restrictions on ORV use are based on protecting natural resources and preventing conflicts with other public land uses. Where ORV use would cause excessive damage to resources or where conflicts with other uses are anticipated, areas were recommended for closure to or limitations on ORV use. If the effects from ORV use were not considered to be significant, the areas were recommended to be open to ORV use.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
88	1	Although the withdrawal order does not prohibit ORV use, lands actually being developed for Bureau of Reclamation (BOR) projects are closed by BOR regulations, unless opened by the BOR. ORV use on withdrawn lands not being used for project development is administered by the U.S. Forest Service or the BLM in accordance with their regulations (43 CFR 420). The ORV designations in this plan apply only to lands for which the BLM has administrative responsibilities.
137	19, H-7	In the Proposed Plan, the area within the boundary of the Camel Back WSA is recommended for closure to ORV use.
		CULTURAL RESOURCES
122	135	Cultural and paleontological resources are protected by numerous laws and regulations. The BLM uses these laws and regulations to protect these resources through avoidance or mitigation of surface-disturbing activities.
123	15, M-9	In the Preferred Alternative, a portion of this area (5,848 acres) would be intensively inventoried for cultural resources. Through the Operation Respect program, the remaining area could be inventoried and monitored using volunteer expertise and labor from the Colorado Archeological Society.
124	15, M-9	These recommendations would be incorporated into activity plans designed to improve protection and public awareness of cultural resources on public lands. Under the auspices of Project Pride, brochures and interpretive displays could be funded through grant money made available to organizations committed to the preservation of cultural resources.
125	15, M-9	The Preferred Alternative recommends intensive inventory of 5,848 acres. Once this inventory is completed and specific information on high-value and high-density sites is obtained, activity plans designed to protect these sites would be developed. These could include changes in ORV designation.
126	165, 168	Upon completion of the intensive inventory, significant cultural sites would be assigned an appropriate designation such as Conservation for Future Study or Public Education use. The activity plans developed for these areas would identify the specific measures that would be needed to protect the areas' cultural values.
		WILDERNESS
4	19	The Wilderness Technical Supplement (WTS) is an integral part of the RMP. It specifically details the wilderness issue and supports and backs up the RMP. Wilderness evaluations, analyses, and considerations are in the WTS. Only the recommendations from the WTS are brought forward into the RMP/EIS. Also see Responses Number 66, 68, and 136.
10	10	The Draft RMP/EIS and Draft WTS address and analyze the wilderness issue and the effects on it and from it. It is not the purpose of these documents to address alternative methods of power production.
20	L-21	Coal leasing would be allowed in the upper portion of the Adobe Badlands WSA because this WSA would be recommended as nonsuitable for wilderness under the Proposed Plan.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
21	L-12	If all three WSAs were designated as wilderness, it would result in the closing of 41,865 acres to ORV use and oil and gas leasing. Since only the Gunnison Gorge WSA was recommended for wilderness designation in the Preferred Alternative, only 21,038 acres would be closed to these uses as a result of wilderness designation. Under the Proposed Management Plan, however, 6,783 acres within the Adobe Badlands WSA and the entire 10,402 acres of the Camel Back WSA would be closed to ORV use even though they were not recommended for wilderness designation.
49	1	Use of motorized equipment for emergency rescue operations may be allowed in a designated wilderness area. Use of motorized equipment by the Colorado Division of Wildlife (i.e. helicopters, outboard motors) may be allowed in a wilderness area with BLM State Director approval. These situations would be addressed in the wilderness management plan that would be developed for designated wilderness areas.
51	22	Mancos shale badlands are not inherently unsuitable for wilderness designation. The Adobe Badlands area will be managed as an Outstanding Natural Area, set aside to preserve unique geologic features and threatened and endangered plants.
52	22	An alternative that would recommend the Camel Back WSA as wilderness with provisions for water development on Winter Mesa is not needed. Under the BLM's Interim Management Policy, new permanent range improvements (i.e. stock reservoirs) may be approved for the purpose of enhancing wilderness values by better protecting the rangeland in a natural condition. Under the BLM's Wilderness Management Policy, new rangeland improvements may be allowed if determined to be necessary for the purpose of resource protection.
54	10	The text has been changed (see the Changes to the Draft RMP/EIS section in this document).
56	18	None of the WSAs are rated as having high mineral potential. The Gunnison Gorge WSA, which is recommended for wilderness designation, has a moderate rating for mineral potential, but there are no known mineral deposits. The BLM feels that the highest and best use of the Gunnison Gorge is as wilderness and has, therefore, recommended it as suitable. Congress will ultimately make the final decision on wilderness designation. FLPMA (section 603(a)) requires that a mineral survey be conducted by the U.S. Geologic Survey and the Bureau of Mines to determine the mineral values, if any, that may be present in an area recommended as suitable for wilderness by the BLM. This report will be completed before the Secretary of the Interior forwards the wilderness designation recommendations to the President.
57	6	The BLM will address issues such as low level military flights in the Wilderness Management Plan that would be developed after Congress designates an area as wilderness.
60	22, L-17	Public Law 96-560, which released the U.S. Forest Service's Roubideau Rare II area from wilderness consideration, did not make any determination on adjacent lands administered by the BLM. Also see Response Number 136 (the last response in this section of this table).
61	31, H-1	If Congress designates the Gunnison Gorge as a wilderness area, Congress will also make the determination as to whether the proposed water projects would be allowed in the wilderness area, and if any mitigation of water rights would occur.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
62	46, 47, 73	Wilderness designation and wild and scenic river designation are two separate issues. Both require Congressional action under separate and distinct Acts.
63	16, 24, L-21	The private land in Red Canyon (within Management Unit D-4) was identified for acquisition on page 3-34 of the Draft RMP/EIS. The Gunnison Gorge Recreation Area Management Plan (July 1985) also identifies these tracts for acquisition.
64	78, 147, M-10	Livestock grazing is permitted in designated wilderness areas to the extent established prior to wilderness designation. New rangeland improvements may be allowed in designated wilderness areas if determined to be necessary for resource protection.
66	21, 22, 26, 28, 87, 89, 101, 125, 139, 142, 143, 145, 150, 152, H-9	The Gunnison Gorge WSA contains outstanding geologic, ecologic, scenic, and wilderness values. The area provides a wilderness whitewater boating opportunity not available in most other wilderness areas. If designated, this area would complement the adjacent National Park Service designated wilderness area. There is local and regional public and political support for designation of the Gunnison Gorge as wilderness.
68	4, 11, 13, 14, 16, 19, 21, 22, 23, 24, 25, 26, 28, 35, 36, 38, 39, 41, 44, 45, 46, 47, 48, 51, 52, 53, 54, 56, 58, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 80, 81, 83, 85, 87, 89, 91, 92, 94, 95, 96, 97, 98, 99, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, 126, 127, 128, 129, 130, 131, 132, 133, 135, 136, 137, 139, 142, 143, 145, 147, 149, 150, 152, 153, 155, 158, 160, 162, 163, 165, 166, 167, 168, 169, 170, 171, 172, 173, H-2, H-4, H-6, H-8, H-10, H-11, H-12, L-1, L-3, L-4, L-5, L-6, L-7, L-8, L-9, L-10, L-11, L-12, L-13, L-14, L-15, L-16, L-17, L-18, L-19, L-20, L-21, M-4, M-7, M-8, M-10	All of the WSAs addressed in the Draft RMP/EIS and Draft WTS meet the requirements for study and consideration for preservation as wilderness. However, additional factors such as potential land uses, impacts to other resources, enhancement of the wilderness preservation system, actual wilderness values of the area, and other available management options all play a major role in determining whether an area should be recommended for designation as wilderness. The BLM recognizes that the Adobe Badlands area meets the minimum wilderness criteria, but does not feel that the area's wilderness qualities are significant enough to warrant inclusion in the National Wilderness Preservation System. Shale-type badlands are presently represented in the NWPS by the Bisti and De-na-zin wilderness areas in New Mexico, both of which are similar in appearance to and within a day's driving distance of the Adobe Badlands WSA. Although the wilderness qualities of the Adobe Badlands are not significant enough to warrant designation as wilderness, it is felt that the area's interesting landforms, threatened and endangered plants, and other values are deserving of some form of protection. Designation of the area as an Outstanding Natural Area is a more appropriate management option for protection of these values. The BLM is therefore recommending that the 6,783 acres of the WSA which contain these values be designated as the Adobe Badlands ONA/ACEC (see Management Unit 15). This management option would also allow the northern portion of the WSA, with its high to moderate coal potential, to remain available for coal leasing.
71	1, 3, 8, 10, 22, 31, 49, 165, 168	These concerns will be addressed during preparation of the final wilderness EIS.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
130	19	Under the Preferred Alternative, the Camel Back WSA becomes part of Management Units D-1, D-2, and D-9. Management for these units corresponds to and is consistent with the management direction outlined in Table 3-8 of the Draft RMP/EIS.
136	9, 11, 13, 14, 16, 19, 21, 22, 23, 24, 25, 26, 28, 35, 36, 37, 38, 39, 41, 43, 44, 45, 46, 47, 48, 49, 51, 52, 53, 54, 55, 56, 58, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 80, 81, 83, 85, 87, 89, 91, 92, 94, 95, 96, 97, 98, 99, 101, 102, 103, 104, 106, 107, 108, 109, 110, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, 126, 127, 128, 129, 130, 131, 132, 133, 135, 136, 137, 138, 139, 142, 143, 145, 147, 148, 149, 150, 152, 153, 155, 158, 160, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, H-2, H-4, H-6, H-7, H-8, H-10, H-11, H-12, L-1, L-3, L-4, L-5, L-6, L-7, L-8, L-9, L-10, L-11, L-12, L-13, L-14, L-15, L-16, L-17, L-18, L-19, L-20, L-21, M-4, M-7, M-8, M-10	All of the WSAs addressed in the Draft RMP/EIS and Draft WTS meet the requirements for study and consideration for preservation as wilderness. However, additional factors such as potential land uses, impacts to other resources, enhancement of the wilderness preservation system, actual wilderness values of the area, and other available management options all play a major role in determining whether an area should be recommended for designation as wilderness. The BLM recognizes that the Camel Back area meets the minimum wilderness criteria, but does not feel that the area's wilderness qualities, although possibly important on a local or regional scale, are significant enough to warrant inclusion in the National Wilderness Preservation System. The Dominguez WSA (73,568 acres) and the Gunnison Gorge WSA (21,038 acres) have both been recommended as suitable for wilderness designation; both of these WSAs are within short driving distances of regional population centers so wilderness designation of the Camel Back WSA would not significantly expand wilderness opportunities in this area. The character, landforms, rock formations, and vegetation of the Camel Back WSA are very similar to those of the Dominguez WSA, which is located within eight miles of the Camel Back WSA. Features typical of both the Camel Back WSA and the Dominguez WSA are the steep-sided mesas covered with pinyon-juniper woodlands and scattered sagebrush parks, and the deep, colorful, sandstone canyons with canyon-bottom riparian vegetation that includes cottonwood, willow, and tamarisk. Roubideau Canyon (within the Camel Back WSA) possesses some outstanding visual features, but it is not unlike several other plateau-region canyons, including upper Spring Creek Canyon, Escalante Canyon, and especially Dominguez Canyon, all of which have similar formations, vegetation, coloration, and scenic qualities. In addition to its natural and scenic values, the Camel Back area provides important habitat for wildlife and threatened and endangered species, and is also used for livestock grazing. Because the Camel Back area's wilderness values are not significant enough to warrant inclusion in the NWPS, the BLM is not recommending it for wilderness designation, and has determined that identifying the area for continued multiple-use management is both effective and appropriate. To provide protection for the area's natural and scenic values, to prevent accidental destruction of threatened and endangered plants, and to reduce active erosion, the Proposed Plan recommends closing the area within the WSA boundary to ORV use.
		SPECIAL MANAGEMENT AREAS
19	L-21	The BLM feels there is adequate space within Management Unit 14 for a nature trail and other interpretive purposes.
28	9, 16, 23, 163, L-3,L-4, L-5, L-7, L-8, L-9, L-11, L-13, L-17, L-21, M-12	The text has been changed; see the management prescriptions (in this document) for Management Units 12, 13, and 15.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
37	9	The recommendations of the BLM Geologic Advisory Group concerning the 1,800 acres in Chukar Canyon and the Ute Indian fault zone were reviewed and considered. These areas are within the Gunnison Gorge WSA, which is recommended for designation as wilderness. On August 22, 1972, the BLM designated Needle Rock as a Class IV Outstanding Natural Area under the Bureau of Outdoor Recreation classification system.
101	8, 24	One purpose of an Environmental Impact Statement is to analyze the impacts of the various alternatives to a proposed action. If management of Areas of Critical Environmental Concern (ACECs) are identical under all management alternatives, there would be no reason to analyze the impacts. The Preferred Alternative gives priority to the protection of ACECs; management priorities emphasize ACECs less in other alternatives. The designation of an ACEC is a discretionary management action which necessitates full environmental analysis and public input. Activity plans will be developed for all designated ACECs as the BLM's operating budget permits.
102	8, 11, 24	Both the Conservation and the Preferred alternatives recommend three areas for ACEC identification; under the Proposed Plan the recommendation has been expanded to four areas. All of the areas which have been identified by either the public, other agencies, or the Resource Area staff have been recommended for some form of special designation.
		LAND TENURE ADJUSTMENTS AND LAND USE MANAGEMENT
16	4	The Final RMP/EIS map has been changed to show all lands within the Black Canyon of the Gunnison National Monument which are administered by the National Park Service. The lands within the proposed Curecanti National Recreation Area are shown as Bureau of Reclamation withdrawn lands since formal designation as a National Recreation Area has not yet occurred.
17	4	The lands near the northeast boundary of the Black Canyon of the Gunnison National Monument are Bureau of Reclamation withdrawn lands, not potential exchange tracts (see map legend).
85	7, 9, 16, 22, 24, 40, 135, 172, H-2, L-21, M-12	Specific criteria for the identification of tracts determined to be suitable for further disposal consideration have been added (see the Disposal of Public Lands discussion in the Proposed Plan section of this Final RMP/EIS). Tracts that do not meet these criteria are no longer being considered as suitable for disposal. All public lands administered by the BLM that do not meet these criteria would be retained in public ownership.
87	1	The BLM would retain withdrawals for all Bureau of Reclamation structures and linear rights-of-way for all laterals on tracts that would be identified for disposal.
89	1	The Final RMP/EIS map has been changed to reflect these corrections. Standard mapping practice is to not show withdrawals over water surfaces. The withdrawal boundary extending into the reservoir is indicative of the lands affected by the withdrawal. Disposal would be contingent upon the lifting of existing withdrawals on those tracts in T. 14 S., R. 92 and 93 W.
90	1	The text has been changed to include all public entry laws. See the Changes to the Draft RMP/EIS section of this document.
91	1	Current laws and regulations do not permit the transfer of BLM powersite reserves to the Bureau of Reclamation. Under the Proposed Plan, the powersite

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
		classifications in the Dominguez area would be lifted to allow a full range of multiple-use management.
92	1	The text has been changed; the column in Table 2-17 entitled "Purpose" is now entitled "Primary Purpose". See the Changes to the Draft RMP/EIS section in this document.
93	1	All tracts currently under Bureau of Reclamation withdrawal would be evaluated through the withdrawal review program; if the withdrawals are not lifted, these tracts would be retained in public ownership.
		MAJOR UTILITIES
30	11, 31	Management Unit D-7 would be managed for existing and potential coal development. Major utilities in areas containing coal resources would result in a loss of coal revenue because State regulations require that surface structures be protected from subsidence. This is usually accomplished by leaving more coal in-place to support the surface structures than would normally be required for room-and-pillar mining. If utility corridors were permitted over coal resources, the coal would not be managed in the best and most efficient manner.
94	9, 16, L-21	Whether an area (including all special management areas) is open, closed, or restricted to major utility development is addressed by management unit in each of the alternative prescriptions (see Chapter Three of the Draft RMP/EIS).
95	31	The 1980 Western Regional Corridor Study is a planning tool and has been used as such during the preparation of this RMP/EIS. In addition to the 1980 Study, the BLM also utilized the 1985 Western Regional Corridor Study, and consulted with the Delta-Montrose Electric Association, the Colorado-Ute Electric Association, the San Miguel Power Association, the U.S. Forest Service, and the BLM offices administering adjacent public lands.
112	31	The disturbance associated with construction and maintenance of major utilities and their related facilities increases stress on big game, especially when this disturbance occurs on crucial winter ranges when the animals are already under stress caused by environmental factors. Mitigating measures help avoid or reduce much of this impact, although such measures are seldom 100 percent effective.
115	31	As stated on page 3-38 of the Draft RMP/EIS, riparian areas would be open to the development of major utility facilities. Only surface-disturbing activities which would have long-term adverse effects would be prohibited.
		ACCESS AND TRANSPORTATION
9	152, H-9, H-11	Public access across private land is generally obtained through purchased easements. Condemnation can be used as a last resort, but only if negotiations fail completely and such action is justifiable. After a route analysis is completed to determine the best access location, the BLM negotiates with the landowner(s) to determine mitigating measures and resolve problems and conflicts. The BLM usually assumes maintenance responsibility for all acquired easements.
18	H-2	The BLM recommends acquisition of public access on the McCarty Trail in the Preferred Alternative on page 3-32 of the Draft RMP/EIS.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
48	H-2	As stated on page 3-35 of the Draft RMP/EIS, the BLM has proposed access acquisition in these areas. The BLM presently manages some land at the confluence which is used as a boater put-in/take-out site. The adjacent private land (Gunnison River Pleasure Park) provides a raft/kayak take-out point, but a user fee is charged; public use is not otherwise restricted.
84	22	Revised Statutes 2477 (RS 2477) was repealed by the Federal Lands Policy and Management Act of 1976 (FLPMA). The acknowledgement and documentation of RS 2477 grants for public highways constructed on unreserved public land prior to October 21, 1976, is a non-discretionary action and, therefore, does not necessitate inclusion in this RMP/EIS.
		SOCIAL AND ECONOMIC RESOURCES
1	H-2	The location of the Storm King Ski area is shown as Management Unit C-10 on the Conservation Alternative map. The information on pages 4-60 and 4-61 of the Draft RMP/EIS was derived from data provided by Storm King Associates (the proposal's developer), Colorado Ski Country U.S.A., and the State of Colorado through the Division of Local Government's Computer Model-Planning and Assessment Model.
3	11	In Chapter Four of the Draft RMP/EIS, resource management trade-offs are identified as impacts which are generated by various management actions. These impacts, including effects on economic conditions under each of the management alternatives, were considered in the development of the Preferred Alternative and will be considered in the final resource management plan.
		GENERAL RESOURCE MANAGEMENT
2	22, L-17	The Preferred Alternative was developed based on the identified issues, public input, conflicts with other resources and uses, and laws and regulations. It is composed of portions or combination of portions of the other management alternatives. The Preferred Alternative is not a final decision; rather it represents the management that the BLM has proposed for the public lands in the planning area. The RMP/EIS is published as a Draft to allow for public review and comment. After consideration of the public input, the BLM will develop the Final Resource Management Plan and provide rationale for the final decisions.
5	H-2	It would be impossible to show in detail on a map all the areas that would be impacted by the various actions. The maps in the Draft RMP/EIS illustrate where most resources are located and this helps indicate where impacts would occur. Since the plan covers a possible 15-year period and some actions, such as utility development, mining, and oil and gas exploration and development are not planned by the BLM, the locations and time frames on specific impacts are not known.
13	11, H-3, H-11	The RMP is a general land use plan that establishes land use allocations. The BLM feels this plan provides the general objectives and guidance needed to manage the public lands. Based on the direction in the RMP, specific activity plans which will identify objectives, mitigating measures, and specific management actions will be developed for the various resources and resource uses.

Table 3 (continued)

RESPONSE NUMBER	COMMENTER OR LETTER NUMBER	BLM's RESPONSE TO THE COMMENT
14	H-13	Although the management unit boundaries shown on each map cross private and other non-federal lands, the management prescriptions apply to only those lands for which the BLM has administrative authority. This includes surface and/or subsurface estate.
15	5	The boundary of Management Unit D-15 is the Cimarron River; the unit is not adjacent to High Mesa.
22	16, L-21, M-12	Since specific data for proposed actions from mining and other surface-disturbing activities are not known, impacts were expressed in qualitative rather than quantitative terms. Environmental assessments will be prepared on specific actions and projects, following the general land use allocations provided in the RMP. Impacts will be analyzed and quantified at that time.
25	8	It is the BLM's policy to involve the public and local, state, and federal government agencies in the planning process. Attempts have been and will be made to gain input from these entities on site-specific proposals, actions, and environmental assessments.
86	27, 28, 79, 82, 84, 86, 88, 93, 100, 111, 124, 134, 140, 141, 144, 146, 148, 151, 154, 159, 161,	BLM management is based upon the principles of multiple-use and sustained yield; it is a combination of uses that takes into account long-term needs for renewable and non-renewable resources. All of the alternatives described in the Draft RMP/EIS are designed to provide multiple-use management but are based upon different overall management objectives.
108	5	The areas covered by the three proposed wildfire suppression strategies are discussed in the Management Situation Analysis, which is available for public review. Consultation with the U.S. Forest Service will be completed prior to issuance of the Record of Decision for this resource management plan.

CHANGES TO THE DRAFT RMP/EIS

Table 4 is a list of changes that have been made to the text of the Draft RMP/EIS. Map 1 shows the changes in the **Limited** ORV use areas, and Map 2 depicts the changes in the areas **Closed** to ORV use; these maps (originally in Appendix G of the Draft RMP/EIS) immediately follow Table 4.

These text and map changes were made in response to public comments or to internal BLM review. The list of changes is not extensive since the Proposed Resource Management Plan (a modified version of the Preferred Alternative) and its accompanying map are included in this document.

Table 4
CHANGES TO THE DRAFT RMP/EIS

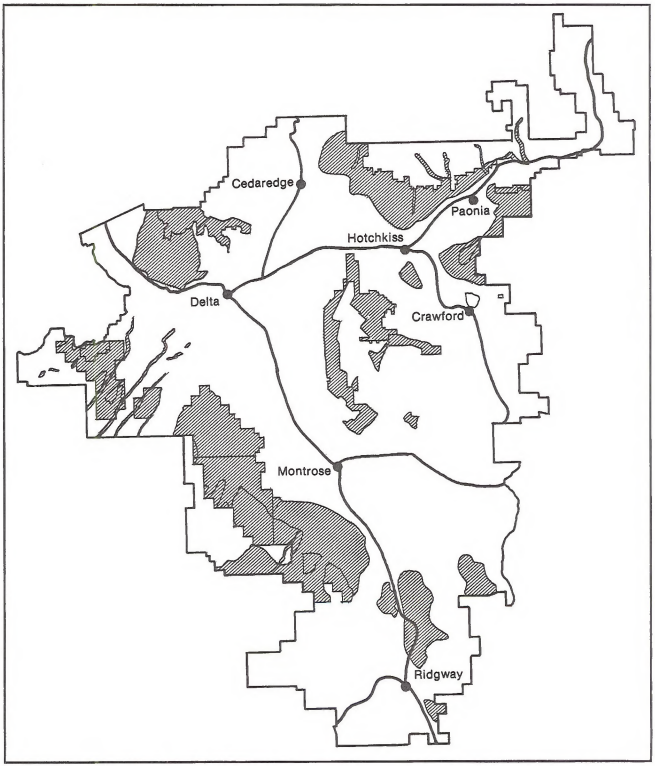
LOCATION OF CHANGE	CHANGE
Page 1-1; Topics Not Addressed in this Plan	At the end of this section add: Potential Colorado National Guard Artillery Range. (This land use proposal will be analyzed in a site-specific analysis when a final application for use is received.)
Page 2-3; Oil, Gas and Geothermal Resources; second paragraph	Change the third sentence to read: The potential for oil and gas production in the planning area is considered low to moderate. There has been little past and no recent production.
Page 2-10; Table 2-6	Add the following entry: (Common Name) Wetherill milkvetch; (Scientific Name) *Astragalus wetherillii;* (Status) BLM Sensitive; (Habitat) Clay hills in association with pinyon-juniper and sagebrush; (Estimated Population) Unknown; (Estimated Acres of Habitat) Unknown.
Page 2-10; Table 2-6	Change the habitat description for Spineless hedgehog cactus to read: Rocky soils. Change the habitat description for Uinta Basin hookless cactus to read: Gravelly soils on flats and low hills along major drainages. Change the habitat description for Delta lomatium to include: and mid-altitude Mancos shale in association with pinyon-juniper.
Page 2-12; Table 2-8	Change the status for the river otter to read: State endangered and federal candidate.
Page 2-19; Table 2-16	Add the following entry: (Area Identification, Number and Name) 35 Proposed Curecanti National Recreation Area; (Size, acres) 3,200; (Scenic Quality) A; (Visual Sensitivity) H; (Viewing Distance) FG; and (Visual Resource Management Class) II.
Page 2-20; Gunnison Gorge WSA	At the end of this section add: The City of Delta, the Pittsburg and Midway Coal Company, and the Colorado-Ute Electric Association hold conditional water decrees on the Gunnison River for potential hydroelectric development. Each proposal for hydroelectric development would affect the Gunnison Gorge WSA in some way. In March 1988, the Pittsburg and Midway Coal Company donated flow rights of 300 cubic feet per second in the Gunnison Gorge to The Nature Conservancy.
Page 2-21; Withdrawals; first paragraph	At the end of the paragraph add: Legal descriptions identifying withdrawals, classifications, and reservations are included in the Management Situation Analysis (MSA) document, which is available for public review at the Montrose BLM Office.

Table 4 (continued)

LOCATION OF CHANGE	CHANGE
Page 2-21; Withdrawals; second paragraph	Change the second and third sentences to read: These withdrawals segregate the affected lands from all public entry laws, including the general mining laws.
Page 2-21; Withdrawals; third paragraph	Change the second sentence to read: Each reserve typically involves 40 acres and segregates the affected lands from operation of the public land laws and from non-metalliferous minerals under the mining laws.
Page 2-22; Table 2-17	Change the title of column four from Purpose to Primary Purpose.
Page 3-18; Management Unit C-1; Locatable Minerals	Remove the word pre-FLPMA.
Page 3-25; Management Unit C-15; Special Land Uses	Delete this entire paragraph.

PROPOSED PLAN

Off-road Vehicle Designation Map



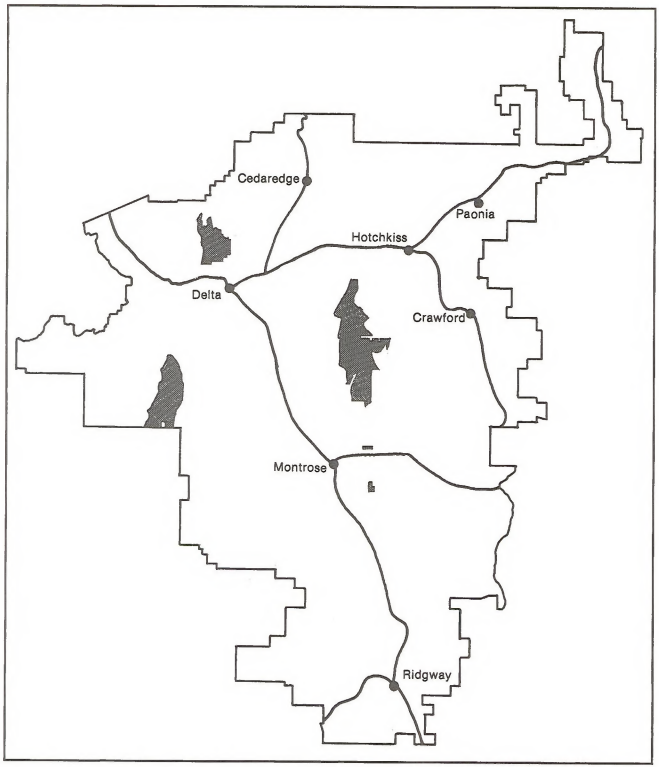
LIMITED: Areas Where Official Vehicle Use Would be Limited to Designated Roads and Trails, Either Seasonally or Year-round.

N

Scale: 1" = 10 Miles

PROPOSED PLAN

Off-road Vehicle Designation Map



CLOSED: Areas Which Would be Closed to Off-road Vehicles Use Year-round.

N

Scale: 1" = 10 Miles

THE PROPOSED RESOURCE MANAGEMENT PLAN

The Proposed Resource Management Plan was developed based on an analysis of the public comments received on the Draft Uncompahgre Basin RMP/EIS. Under the Proposed Plan, the planning area would be managed under the multiple-use concept with restrictions applied so that management objectives would be achieved.

All actions proposed in this plan would comply with current state and federal regulations, standards, and policies. In addition, the following assumptions were made:

1. Site-specific activity plans would be developed or revised, if necessary, to provide detailed management guidance for all management units except the general resource management unit.

2. Site-specific Environmental Analyses (EAs) and Environmental Impact Statements (EISs), if required, would be developed for all management plans and projects within the planning area.

3. The most reasonable foreseeable level of oil, gas, and geothermal development throughout the planning area would involve a maximum of ten applications to drill per year, with an estimated total of 30 acres of surface disturbance per year.

4. Lands cases generated by other agencies, individuals, and entities would be analyzed and processed on a case-by-case basis in accordance with guidance provided by this plan.

5. Recreation and Public Purposes Act (R&PP) land use classifications currently under lease would be retained with the exception of the Delta County and Montrose County landfills.

6. All Wilderness Study Areas (WSAs) would be managed consistent with the Wilderness Interim Management Policy until the final decision on wilderness designation or non-designation is made.

7. The areas recommended for designation as an Outstanding Natural Area (ONA) or a Research Natural Area (RNA) would also be designated as areas of critical environmental concern (ACEC).

Some resource management programs would be standard throughout the planning area under the Proposed Plan. Unless changes in or additions to standard management directions are specifically addressed in the management prescription for each management unit, these resources, programs, and activities would be managed as follows.

Air Quality. Activities and projects on public land would comply with applicable local, state, and federal air quality regulations. Mitigation to minimize air quality degradation would be incorporated into project proposals as appropriate.

Coal. Federal coal estate would be identified as acceptable for further leasing consideration.

Oil, Gas, and Geothermal Resources. At present, the oil and gas program within this planning area is highly speculative. Only three applications to drill have been received over the past twelve years; none of these resulted in producing wells. Based on this data, the BLM does not foresee any change in the oil and gas program over the life of this plan.

Federal oil, gas, and geothermal estate on both federal surface and split-estate lands would be open to leasing with standard lease terms. Other conditions for leasing such as no surface occupancy and seasonal stipulations (see Appendix A of this Proposed Plan) are assigned in each management unit prescription; special stipulations and conditions also apply to federal surface and split-estate lands. Any special stipulations (i.e., seasonal closures) prescribed for a management unit would apply to seismic and drilling activities.

Resource information for split-estate lands, upon which the recommended stipulations are based, has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. Consultation with the surface owner also requires the consideration of private uses of the surface. If, after on-site inspection and consultation, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Locatable Minerals. All existing withdrawals that segretate federal mineral estate from location and entry under the general mining laws would be recommended for retention. Federal mineral estate in areas not under withdrawal would be open to entry and location.

Mineral Materials. Federal mineral estate would be open to disposal of mineral materials.

Soils and Water Resources. Water quality and erosion conditions would be inventoried and monitored. Measures designed to minimize erosion and water quality deterioration would be required in plans for surface-disturbing land use activities. The area would be open to land treatments and development of in-channel structures and project facilities.

Riparian/Aquatic Systems. Riparian zones and aquatic habitats would be inventoried and monitored where necessary to provide information for proper management. Vegetation conditions and streambank cover would be maintained or improved. Measures designed to minimize site-specific riparian and aquatic deterioration would be required in plans for surface-disturbing land use activities.

Threatened and Endangered Species. Threatened and endangered species and unique plant associations would be inventoried and monitored where necessary to provide information for proper management. Clearances would be conducted on all proposed surface-disturbing activities and the U.S. Fish and Wildlife Service (USFWS) would be consulted as required. Measures designed to protect threatened and endangered species and their habitat would be required in all land use activity plans. Supplemental releases and reintroduction of federal and state listed endangered, threatened, and candidate species could be authorized following environmental analysis and consultation with the USFWS, the Colorado Division of Wildlife (DOW), and other affected parties.

Wildlife Habitat. Wildlife forage allocations would remain at current levels until studies determine adjustments are needed to achieve management objectives. Additional forage allocations would be divided equally between wildlife and livestock grazing. Wildlife habitat monitoring studies would be established and/or maintained on all crucial winter ranges. The planning area would be open to land treatments and project facility development. Existing wildlife facilities and land treatments would be maintained. Supplemental releases and reintroduction of native or naturalized fish and wildlife species (excluding federal or state listed endangered, threatened, or candidate species) could be authorized by the District Manager following environmental analysis.

Livestock Grazing. Suitable public lands would be available for livestock grazing use. Livestock utilization would be managed at current forage allocation levels until studies indicate adjustments are needed to achieve management objectives. New or additional available forage would be divided equally between livestock and wildlife. Existing livestock facilities would be maintained. Existing allotment management plans (AMPs) would be updated as needed and new AMPs would be developed. New livestock facilities and land treatment projects would be developed if needed to achieve AMP objectives. Vegetation condition and trend monitoring studies would be established and/or maintained. Maximum sustained livestock utilization levels of key forage species would be 50 percent. Allotment categorization would determine management and monitoring intensity.

Forestry. Suitable commercial forest lands and pinyon-juniper woodlands would be managed for sustained yield production within the allowable cut restrictions determined by the Timber Production Capabilities Classification (TPCC) inventory.

Recreation. Public lands would be managed for extensive recreational use.

Off-Road Vehicles. Public lands would be open to off-road vehicle (ORV) use.

Cultural Resources. Cultural and historical sites would be inventoried. Clearances would be conducted on sites of all proposed surface-disturbing activities. Measures designed to protect cultural and historical resources would be required in all land use activity plans.

Paleontological Resources. Paleontological resources would be inventoried and appropriate protective measures would be developed if necessary.

Visual Resources. Public lands would be managed under current visual resource management (VRM) classifications and guidelines.

Major Utilities. Public lands would be open to development of major utility facilities. Stipulations and mitigating measures would be developed on a case-by-case basis.

Powersite Withdrawals. Pending determination of potential, existing powersite withdrawals would be maintained. These lands would not be subject to further consideration for disposal. No significant long-term investments would be made on these lands unless the investment could be recovered prior to development.

Access. In addition to the specific access needs identified in the management unit prescriptions, the access needs identified in the resource area's transportation plan would be acquired as opportunities arise.

Fire Management. Any fire which occurs in a fire use category area before a prescribed burn plan is approved, or which is not within the limits of the prescription, or which threatens life or property would be suppressed as a conditional suppression area fire.

The following management prescriptions comprise the Proposed Resource Management Plan. Acreage figures used in this discussion are approximations. Table 5 identifies the management units that were established for the Proposed Plan.

Table 5
MANAGEMENT UNITS:
PROPOSED PLAN

MANAGEMENT UNIT	ACRES OF PUBLIC SURFACE	PERCENTAGE [1] OF THE PLANNING AREA	IMPORTANT RESOURCES, VALUES, OR LAND USES
1	186,810	39%	Livestock grazing, wildlife habitat, recreation, woodlands
2	67,320	14%	Wildlife habitat, coal, woodlands
3	47,607	10%	Woodlands, wildlife habitat, livestock grazing
4	40,792	8%	Recreation, soils, woodlands
5	24,177	5%	Soils, recreation, oil and gas
6	21,038	4%	Wilderness, recreation, T&E species
7	17,232	4%	Coal, wildlife habitat
8	8,942	2%	Recreation, soils
9	6,320	1%	Riparian/aquatic habitat, livestock grazing
10	3,292	Less than 1%	Wildlife habitat, coal, recreation, commercial timber
11	1,990	Less than 1%	Wildlife habitat, recreation
12	1,895	Less than 1%	Recreation, T&E species
13	377	Less than 1%	T&E species, soils
14	80	Less than 1%	Recreation, scientific values
15	6,783	1%	T&E species, scenic values, soils
16	48,422	10%	General land uses

[1] Percentages are rounded to whole numbers.

PROPOSED PLAN

DISPOSAL OF PUBLIC LANDS

Disposal criteria have been developed for use in identifying disposal tracts under the Proposed Plan. These tracts are identified on the map that accompanies this document.

General Disposal Criteria. Tracts of public land that are difficult and uneconomical to manage because of their location and other characteristics, and tracts of public land that would best serve the public interest through their disposal would be identified as suitable for disposal under the Proposed Plan.

Specific Disposal Criteria. Tracts of public land meeting the following specific criteria would be identified as suitable for disposal under the Proposed Plan:

1. Tracts of 500 acres or less which: (1) are not administrative sites; (2) do not contain important mineral resources; (3) do not contain known threatened or endangered species; or (4) do not border lakes, rivers, or perennial streams where potential recreational development is likely.

2. Existing R&PP landfill sites.

A total of 143 tracts of public land totalling 11,026 acres would be identified for consideration for disposal through sale or exchange under the Proposed Plan. Existing R&PP classifications on two tracts and existing withdrawals on several tracts would be lifted prior to disposal.

Prior to disposal, resources within identified tracts would be managed according to the management prescription for the management unit in which they are located. Minimal funds, if any, would be spent on improvements on these lands. Federal mineral estate would be conveyed with surface estate where it would be in the public interest.

MANAGEMENT UNIT 1

186,810 Acres of Public Surface; 39 percent of the Planning Area

Management Unit 1 consists of 186,810 acres of public land located primarily on the northeast-facing slopes of the Uncompahgre Plateau north of Colorado Highway 90. The area's range of elevations gives it a high value for both summer and winter livestock grazing.

Public lands within the management unit would be managed as "I" category (150,114 acres), "M" category (25,727 acres), and "C" category (8,950 acres) grazing allotments. Also, 2,019 acres that are presently unallotted for livestock use would be available for grazing application.

The management unit would be managed to improve vegetation conditions and forage availability for livestock grazing. Land treatment projects and other facilities designed to improve livestock forage and distribution would be developed. Intensive monitoring studies would be established and maintained on all "I" and "M" category allotments. Existing AMPs would be updated as needed and new AMPs would be developed for allotments without plans. As additional forage becomes available, livestock would have priority for allocation. Relinquished, cancelled, or acquired livestock grazing permits would be reissued according to regulations.

Oil and Gas. Federal oil and gas estate would be open to leasing. Seasonal stipulations on seismic and drilling activities would be in effect from December 1 through April 30 on 64,815 acres (federal surface) and 560 acres (split-estate) of crucial deer and elk winter range, and on 3,757 acres (federal surface) and 63 acres (split-estate) used by bald eagles for hunting habitat. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. The Bureau of Reclamation (BOR) withdrawal on Fruitland Mesa and both the BOR withdrawal and the BLM powersite classifications along the Gunnison River downstream of Delta would be recommended for revocation to allow for mineral exploration and development, facilitate resource management, and permit long-term land use planning.

Soils and Water Resources. Non-conflicting erosion control objectives, projects, and mitigating measures would be incorporated into new and existing AMPs. In-channel structures and land treatment projects designed to reduce runoff and soil erosion would be developed.

Wildlife Habitat. Non-conflicting wildlife habitat management objectives, projects, and mitigating measures would be incorporated into new and existing AMPs. Existing wildlife habitat projects would be maintained. Bighorn sheep could be transplanted into the Winter Mesa area if they would not conflict with current and future livestock grazing forage allocations. Wildlife would have first priority for all additional forage made available as a result of non-BLM wildlife-funded rangeland improvement projects.

Forestry. Woodland harvest areas would be managed for increased forage production and would be compatible with AMPs.

Recreation. River access would be developed at the Escalante Bridge. Maps and informational materials on river use would be provided. The BLM would manage recreation use in a manner that would minimize recreational impacts on interspersed and adjacent private land.

Off-Road Vehicles. A total of 7,240 acres in the Winter Mesa/Roubideau Creek area would be closed to ORV use. Vehicle use on crucial deer and elk winter range (64,815 acres) would be limited to designated roads and trails from December 1 through April 30 if necessary to reduce stress

on wintering deer and elk. The remainder of the management unit would be open to ORV use.

Cultural Resources. A total of 5,848 acres of public land between Colorado Highway 90 and the Big Sandy Wash would undergo a Class III cultural inventory to determine the significance and location of high-value archeological sites. Upon completion of the inventory and data analysis, some of these sites may be assigned a special designation and a management plan would be developed.

Visual Resources. The management unit would be managed under VRM Class III guidelines, except for Escalante Canyon which would be managed under VRM Class II guidelines to protect its scenic qualities.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would improve livestock management and increase crucial deer and elk winter range would be acquired through exchange only.

Access. Public road access would be acquired into the Olathe Reservoir area for hunting and other recreational purposes. Public trail access would be acquired on the McCarty Trail in lower Escalante Canyon to provide additional access into the Dominquez Canyon WSA.

Fire Management. A total of 97,543 acres of public land would be managed under the fire suppression category, with 8,657 acres identified for intensive suppression and 88,886 acres identified for conditional suppression. A total of 89,267 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 2

67,320 Acres of Public Surface; 14 percent of the Planning Area

Management Unit 2 consists of 67,320 acres of public land located primarily on the southern end of the Uncompahgre Plateau and in the lower elevations of the North Fork Valley. These areas have large wintering deer and elk populations. Approximately half of the management unit is considered crucial deer and elk winter range. A portion of the unit, in the Camel Back/Roubideau Creek area, is suitable habitat for desert bighorn sheep.

The management unit would be managed to improve the areas' capabilities to support wintering deer, elk, and bighorn sheep populations. Land treatment projects and other facilities designed to improve the quality and quantity of winter habitat would be developed. Wildlife would have first priority for all additional forage made available as a result of BLM habitat improvement projects. All other land uses would be permitted if they would not degrade the areas' winter range capabilities. Disturbances would be minimized from December 1 through April 30 on crucial deer and elk winter range (37,007 acres). Habitat in the Camel Back/Roubideau Creek area would be available for possible introduction of desert bighorn sheep.

Coal. Federal coal estate would be open to leasing. Within crucial deer and elk winter range, seasonal stipulations on new road and facility construction may be necessary from December 1 through April 30 to reduce stress on wintering deer and elk.

Oil and Gas. Federal oil and gas estate would be open to leasing. Within crucial deer and elk winter range (37,007 acres of federal surface and 8,850 acres of split-estate), seasonal stipulations on seismic and drilling activities would be in effect from December 1 through April 30 to reduce stress on wintering deer and elk. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Mineral Materials. Federal mineral estate would be open to disposal of mineral materials. Within crucial deer and elk winter range, seasonal restrictions on disposal activities may be necessary from December 1 through April 30 to reduce stress on wintering deer and elk.

Soils and Water Resources. Non-conflicting erosion control objectives, projects, and mitigation measures would be incorporated into new wildlife habitat management plans (HMPs). Land treatment and erosion control projects would be permitted if they would be compatible with wildlife habitat management objectives.

Livestock Grazing. Livestock grazing would continue at current forage allocation levels and seasons of use unless studies determine adjustments are needed. Livestock would have first priority for all additional forage made available as a result of livestock operator-funded rangeland improvement projects. Non-conflicting livestock management objectives, projects, and mitigating measures would be incorporated into new wildlife HMPs. Facility development and land treatment projects would be permitted if they would be compatible with wildlife habitat management objectives.

Forestry. The management unit would be available for woodland product harvests. On 37,007 acres of crucial deer and elk winter range, seasonal restrictions on harvests may be necessary from December 1 through April 30 to reduce stress on wintering deer and elk. Woodland harvests would be designed to increase forage production and would be compatible with wildlife habitat management objectives.

Off-Road Vehicles. A total of 2,482 acres in the Camel Back/upper Roubideau Creek drainage area would be closed to ORV use. Vehicle use in the remainder of the management unit would be limited to designated roads and trails from December 1 through April 30. Variances to this seasonal

limitation may be granted if ORV use would not result in any negative impacts on wintering deer and elk.

Visual Resources. The management unit would be managed under VRM Class III guidelines.

Major Utilities. The management unit would be open to development of major utility facilities. Within crucial deer and elk winter range, construction activities may be restricted from December 1 through April 30 if necessary to reduce stress on wintering deer and elk.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary for effective management of crucial deer and elk winter range may be acquired through exchange.

Access. Public access would be acquired into the McDonald Mesa, Roatcap-Jay Creek, Spaulding Peak/Dry Creek, Oak Mesa, and Oak Ridge areas for hunting and other recreational uses, wildlife habitat management, and timber and woodlands management.

Fire Management. A total of 53,502 acres of public surface would be managed under the fire suppression category, with 48,118 acres identified for intensive suppression and 5,384 acres identified for conditional suppression. A total of 13,818 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed in these areas.

MANAGEMENT UNIT 3

47,607 Acres of Public Surface; 10 percent of the Planning Area

Management Unit 3 consists of 47,607 acres of public land located primarily on the northeast-facing slopes of the Uncompahgre Plateau. The management unit contains some of the most productive pinyon-juniper woodland sites in the planning area which are used extensively for livestock grazing and are valuable deer and elk habitat.

The management unit would be managed for sustained yield production of the woodland resource within the allowable cut restrictions determined by the TPCC inventory (23,206 acres).

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect on crucial deer and elk winter range (28,552 acres of federal surface and 25 acres of split-estate) from December 1 through April 30 if necessary to reduce stress on wintering deer and elk. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Soils and Water Resources. Non-conflicting erosion control objectives, projects, and mitigating measures would be incorporated into new forest management plans (FMPs). Existing erosion control projects would be maintained and new projects would be developed if they would not decrease the woodland base.

Wildlife Habitat. Non-conflicting wildlife habitat management objectives, projects, and mitigating measures would be incorporated into new FMPs. Existing wildlife habitat projects would be maintained and new projects would be developed if they would not decrease the woodland base.

Livestock Grazing. Non-conflicting livestock grazing management objectives, projects, and mitigating measures would be incorporated into new FMPs. Existing livestock projects would be maintained and new projects would be developed if they would not decrease the woodland base.

Off-Road Vehicles. The management unit would be open to ORV use except in crucial deer and elk winter range (28,552 acres) where vehicle use would be limited to designated roads and trails from December 1 through April 30 if necessary to reduce stress on wintering deer and elk. Use of ORVs for woodland management and harvest purposes would be authorized year-round.

Access. Public access would be acquired into the Beaver Hill and Linscott Canyon areas for woodland harvest and recreation purposes.

Fire Management. A total of 25,162 acres of public land would be managed under the fire suppression category, with 21,187 acres identified for intensive suppression and 3,975 acres identified for conditional suppression. A total of 22,445 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 4

40,792 Acres of Public Surface; 8 percent of the Planning Area

Management Unit 4 consists of the 40,792 acres of public lands surrounding the Gunnison Gorge. The management unit is characterized by a diversity of landscapes and high-value recreation opportunities. The need to protect both the quality and diversity of recreation opportunities and to facilitate recreation use would be recognized as important during the formulation of management decisions affecting the area.

The management unit would be managed as the Gunnison Gorge Special Recreation Management Area (SRMA). Maps, interpretive materials, and facilities would be developed. Recreation use would be monitored and possibly

restricted as necessary to protect natural features and recreation opportunities.

Lands in the Peach Valley area (15,610 acres) would be managed for ORV recreation opportunities. A minimum of restrictions would be placed on surface-disturbing activities and a high concentration of recreation users would be permitted within this area.

Motorized access to the remainder of the management unit (25,182 acres) would be restricted to designated roads, the majority of which are primitive in character. This area would be managed to maintain a predominantly natural environment with low but evident human concentrations and impacts.

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from December 1 through April 30 on crucial deer and elk winter range (8,077 acres of federal surface and 280 acres of split-estate). Variances in this seasonal restriction may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. Federal mineral estate would be open to entry and location. The BLM protective withdrawal (PLO 5261; September 15, 1972) would be revoked and the BOR withdrawal on Fruitland Mesa would be recommended for revocation. Revoking these mineral withdrawals would allow for mineral exploration and development, facilitate resource management, and permit long-term land use planning.

Soils and Water Resources. The Elephant Skin Wash salinity control project would be maintained to reduce saline runoff. Elephant Skin Wash would be protected from surface-disturbing activities.

Wildlife Habitat. Bighorn sheep habitat in the Smith Fork Canyon (2,250 acres) would be monitored and protected. Activities and land uses that are consistent with maintaining the necessary forage and isolated habitat requirements of bighorn sheep would be permitted.

Livestock Grazing. Livestock grazing would continue at current forage allocation levels and seasons of use unless studies indicate that adjustments are needed. The 140-acre Gunnison Forks habitat management area would remain unallotted for livestock grazing. Livestock forage utilization would be limited to 35 percent in the Elephant Skin Wash area (2,370 acres) as necessary to protect soils by maintaining an optimum basal ground cover.

Forestry. A 1,255-acre portion (in the Black Ridge area) of the 2,500 acres of harvestable woodlands within the management unit would be available for management and harvest. This area would be closed to harvest from December 1 through April 30 to protect crucial deer and elk winter range. The remaining harvestable woodlands (1,245 acres) would be managed for scenic and relic-area values and would not be harvested.

Off-Road Vehicles. A total of 15,610 acres in the Peach Valley area would be open to ORV use. To protect natural and scenic values, vehicle use in the Elephant Skin Wash area and the remainder of the management unit would be limited to designated roads and trails yearlong.

Visual Resources. The 15,610 acres open to ORV use would be managed under VRM Class IV guidelines.

Major Utilities. A total of 2,462 acres in the Smiths Mountain and Gunnison Forks areas would be open to but not preferred for development of new major utility facilities. These lands could be utilized for major utility development if there are no feasible alternatives. The remainder of the management unit would be closed to new major utility development to protect natural and scenic values.

Acquisition of Non-Federal Lands. Actions would be initiated to acquire 2,200 acres of non-federal lands, as identified in the Gunnison Gorge Recreation Area Management Plan (RAMP), that would be necessary to facilitate public access and enhance recreational values.

Access. Public access would be acquired along the Gunnison Gorge rim southwest of the Gunnison Forks and from Colorado Highway 92 to the Gunnison River in the Austin area for recreation purposes.

Fire Management. A total of 26,070 acres of public land would be managed under the fire suppression category and identified as conditional suppression areas. A total of 14,722 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 5

24,177 Acres of Public Surface; 5 percent of the Planning Area

Management Unit 5, totalling 24,177 acres, consists of Mancos shale hills commonly known as the "adobes". These highly erodible soils, combined with a lack of protective vegetation, can produce sediment loads in local watersheds that are high in salinity. High precipitation runoff rates from the adobes contribute to overall salinity levels in the Upper Colorado River Basin. Salinity yields are increased within localized areas due to increased erosion from surface-disturbing activities including ORV use and livestock grazing.

The management unit would be managed to reduce salinity loads in the Upper Colorado River Basin. In-channel structures and land treatment projects designed to reduce runoff, erosion, and sedimentation would be developed, and

surface protection measures would be implemented. Forage utilization would be managed to achieve the basal ground cover objectives identified in Table 6. Surface-disturbing activities would be curtailed from March 1 through May 31 when saturated soils are most vulnerable to damage. Activities and other land uses which are consistent with maintaining the soil and vegetative conditions necessary to reduce erosion and salt contributions to the river basin would be permitted.

Table 6

OBJECTIVES FOR PERCENT GROUND COVER WITHIN MANAGEMENT UNIT 5

RANGE SITE	LOCATION	PERCENT BASAL GROUND COVER
Stony saltdesert	North of Delta	10
Clayey saltdesert	South of Hotchkiss	10
Salt flats	South of Hotchkiss	7
Clayey saltdesert	Bone Mesa	10

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from March 1 through May 31 to protect erodible and saline soils on 24,177 acres of federal surface and 4,155 acres of split-estate. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Mineral Materials. Federal mineral estate would be open to mineral material activities except from March 1 through May 31 if necessary to protect wet soils.

Livestock Grazing. Livestock grazing would be allowed except from March 20 to range readiness to protect plant species during the spring growth period, and to prevent soil disturbance when saturated soils are most vulnerable to damage. If the basal ground cover is less than the objectives identified in Table 6 livestock forage utilization would be managed at 35 percent of key forage species to increase basal ground cover.

Off-Road Vehicles. To protect highly saline soils, vehicle use in the entire management unit would be limited to designated roads and trails yearlong.

Major Utilities. The management unit would be open to development of major utility facilities but no surface-disturbing activities would be permitted from March 1 through May 31 if necessary to protect wet soils.

Fire Management. A total of 22,992 acres of public land would be managed under the fire suppression category and identified as conditional suppression areas. A total of 1,185 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 6

21,038 Acres of Public Surface; 4 percent of the Planning Area

Management Unit 6 is the Gunnison Gorge WSA (CO-030-388). The WSA, totalling 21,038 acres, would be recommended as preliminarily suitable for wilderness designation. Until a final decision on wilderness designation or non-designation is made, the Gunnison Gorge WSA would be managed according to the Wilderness Interim Management Policy and the Gunnison Gorge RAMP.

During the wilderness intensive inventory, the Gunnison Gorge was determined to meet the wilderness size requirement of at least 5,000 acres, to be natural, and to provide outstanding opportunities for solitude and primitive/unconfined recreation. The scenic and wilderness canyon complex of the area has received considerable publicity and public interest. If designated as wilderness by Congress, activities and land uses that are consistent with preserving the natural condition and wilderness character of the area would be permitted.

Air Quality. The management unit would be managed within federal air quality Class II guidelines unless the State of Colorado reclassifies the area, or other areas, as a result of procedures prescribed in the Clean Air Act as amended in 1977. Under other state authorities, the Gunnison Gorge WSA is currently managed as a Category I area where more restrictive sulfur dioxide requirements apply.

Oil and Gas. Federal oil and gas estate would be closed to future leasing. There are no pre-FLPMA leases in the WSA. Development of any post-FLPMA leases would be permitted only if activities would result in no impairment of wilderness characteristics.

Locatable Minerals. The management unit would be closed to mineral entry and location except for pre-FLPMA claims determined to have valid discoveries. The majority of the area (74 percent) is presently withdrawn from mineral entry.

Mineral Materials. The management unit would be closed to disposal of mineral materials.

Soils and Water Resources. Where natural recovery is unlikely, deteriorated watershed conditions would be restored if life, property, or wilderness values are threatened, or if serious depreciation of important environmental

qualities outside the wilderness area is evident. Revegetation efforts would be limited to use of native or naturalized species. Whenever feasible, non-motorized access and project development methods would be required. Approval of the BLM Director would be required for all watershed restoration projects.

Threatened and Endangered Species. Threatened and endangered species research and habitat improvement would be permitted if activities are consistent with protection of wilderness values. Habitat would be managed for federally-listed bald eagles and peregrine falcons and state-listed river otters. Recreation use would be restricted if necessary for the protection of threatened and endangered species.

Wildlife Habitat. Wildlife habitat would be managed to allow for natural distribution, numbers, and interaction of indigenous wildlife and fish species. Developed facilities, if necessary for the continued existence or welfare of a wildlife species, would be permissible if wilderness characteristics would not be impaired. Bighorn sheep habitat and deer and elk winter range would be managed in cooperation with the Colorado DOW. Supplemental releases of bighorn sheep would be permitted as identified in the 1986 reintroduction plan or its future amendments.

Livestock Grazing. Livestock grazing and facility maintenance would be managed at levels and conditions established prior to wilderness designation. New rangeland improvements would be permissible if determined to be necessary for rangeland and/or wilderness protection.

Forestry. Woodland harvest and/or management would be permitted only for control of insects and disease if determined necessary to protect resources outside the management unit. There is a total of 337 acres of productive woodlands within the WSA that would be unavailable for management and harvest.

Recreation. Recreation use would be regulated as necessary to protect wilderness values. Highest priority would be given to low-impact recreation activities that could not be accommodated outside the wilderness environment. Opportunities for non-motorized recreation in a predominantly natural environment would be maintained. Facilities, improvements, and signs would be limited to those necessary to protect wilderness resources along with public health and safety. Permits would be required for all commercial recreation uses and, if necessary to protect wilderness values, for all non-commercial recreationists. Hunting, fishing, and recreational trapping would be permitted.

The river corridor would be managed to maintain very low human group concentrations and little overall evidence of human use. River-boating use would be limited to six to ten group encounters per day with no more than one commercially-outfitted trip allowed per day. Allocations between private and commercial river-boating use would be made if necessary to protect wilderness values or to emphasize opportunities for specific recreational experiences such as self-reliance as opposed to guided and outfitted experiences.

Off-Road Vehicles. Vehicle use in general would be eliminated from the management unit. Vehicle use would be permitted in certain circumstances involving valid existing rights, livestock grazing, fire suppression, life-threatening emergencies, and wilderness area administration. The rugged canyon area has few vehicular access routes.

Cultural and Paleontological Resources. In most instances, cultural and paleontological resources would be subject to the forces of nature in the same manner as other wilderness resources. Study or management would not entail excavation, stabilization, or interpretation. Exceptions may be granted by the BLM State Director for unusually significant cultural or paleontological resources.

Visual Resources. The management unit would be managed under VRM Class I guidelines.

Major Utilities. The management unit would be closed to development of utility facilities. The area is not within the lands identified as needed for future major utility development in the 1980 and 1985 Western Regional Utility Corridor Study(s).

Hydroelectric Development. Several hydroelectric projects have been proposed for development on the Gunnison River which would be within or affect the WSA. Temporary protective withdrawals have disallowed major on-the-ground evaluations by the proponents. The President has compatibility decision authority between the wilderness and the prospecting for hydroelectric sites, and BLM recommends that he recommend to Congress the unsuitability of actual dams or construction of dams in the wilderness designation.

BLM recommends the revocation of BOR withdrawals. However, if BOR determines that the withdrawal is still needed for Reclamation purposes, the withdrawal will be continued.

Access. Public access to the WSA boundary in the Red Canyon area would be identified for acquisition.

Agricultural Development. No agricultural or related development would be permitted within the management unit. The BLM would recommend revocation of the portion of the BOR Fruitland Mesa withdrawal that is within the WSA.

Fire Management. A total of 21,038 acres would be managed under the fire-use category where fire would be utilized as a management tool. Only natural ignitions meeting pre-determined prescriptions would be allowed in this area.

PROPOSED PLAN

MANAGEMENT UNIT 7

17,232 Acres of Public Surface; 4 percent of the Planning Area

Management Unit 7 consists of 54,474 acres of federal coal estate within the planning area and 1,756 acres of federal coal estate outside of the planning area. A 17,232-acre portion of this federal coal estate underlies federal surface estate.

The management unit would be managed for both existing and potential coal development. Development of existing coal leases would continue, and unleased federal coal would be identified as acceptable for further coal leasing consideration with a minimum of multiple-use restrictions. Activities and land uses that are consistent with maintaining existing coal operations and the potential for coal development would be permitted.

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from December 1 through April 30 on 1,730 acres (federal surface) of crucial deer and elk winter range, and on 1,637 acres of federal surface and 630 acres of split-estate lands used as hunting habitat by bald eagles. Variances in these seasonal stipulations may be granted on a case-by-case basis (see Appendix A).

Riparian/Aquatic Systems. Riparian/aquatic zones up to one-quarter mile wide would be protected. Activities that disturb these areas could be approved on a site-specific basis after consultation with affected entities and development of mitigating measures.

Wildlife Habitat. Wildlife would have priority for forage allocations on crucial deer and elk winter range (1,730 acres).

Forestry. All commercial forest lands and pinyon-juniper woodlands that are suitable for harvest would be managed for sustained yield production within allowable cut restrictions determined by the TPCC inventory.

Off-Road Vehicles. Vehicle use in the riparian zones associated with Bear and Roatcap creeks would be limited to designated roads and trails yearlong. Vehicle use in crucial deer and elk winter range (1,730 acres) would be limited to designated roads and trails from December 1 through April 30. This seasonal ORV designation would be subject to change on a site-specific basis if mild winter conditions eliminate the need for protection of a crucial winter range.

Major Utilities. Corridors one-quarter mile wide and located on each side of Colorado Highway 133 would be open to development of major utility facilities. The remainder of the area would be closed to major utility facilities except for those needed for coal development. Within the management unit, 83 percent of the public lands that are identified as needed for future major utility development would be closed to this type of development. This management would greatly reduce the long-term conflicts between new utility facilities and the potential surface effects of coal mine subsidence.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary for effective management of riparian zones along with crucial deer and elk winter range would be acquired through exchange only.

Fire Management. A total of 14,910 acres of public land would be managed under the fire suppression category and identified as intensive suppression areas. A total of 2,322 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on this area.

MANAGEMENT UNIT 8

8,942 Acres of Public Surface; 2 percent of the Planning Area

Management Unit 8 is 8,942 acres of public land northeast of Delta that consists of Mancos shale (adobe badlands) hills with little vegetative cover. The area is suitable and utilized for ORV recreation. ORV activities typically involve local residents and occur during the spring, fall, and winter.

The management unit would be managed as open to ORV use. Recreational and competitive ORV use and a high concentration of recreation users would be permitted within the management unit. Facilities such as informational signs and motorcycle loading ramps could be developed if constructed and maintained to BLM standards by local ORV organizations. A minimum of restrictions would be placed on surface-disturbing activities that do not impede or endanger ORV recreationists.

Prior to management of the area for ORV use, an inventory will be conducted to identify threatened and endangered plant populations. The management unit's proposed boundary will be adjusted to exclude threatened and endangered plants. If plants or plant communities cannot be excluded from the management unit, protective fencing or other measures will be implemented to protect the plants. The USFWS will be consulted.

Livestock Grazing. Grazing use would continue in the management unit but construction of facilities, such as livestock control fences, that create safety hazards or impede free vehicle use would not be permitted.

Visual Resources. The management unit would be managed under VRM Class IV guidelines.

Major Utilities. The management unit would be open to development of major utility facilities.

Fire Management. A total of 8,942 acres of public land would be managed under the fire suppression category and identified as conditional suppression areas.

MANAGEMENT UNIT 9

6,320 Acres of Public Surface; 1 percent of the Planning Area

The public land riparian zones that comprise Management Unit 9 occur throughout the planning area and are generally associated with perennial or intermittent streams. These areas (6,320 acres) have a very high productive capability and are very important in maintaining the water quality of the adjacent streams.

The management unit would be managed to restore and enhance riparian vegetation along 40 miles of streams. Objectives and projects designed to accelerate improvement of species diversity, streambank cover and stability, and instream structure, and to raise the water table would be incorporated into existing activity plans or developed in new riparian/aquatic system management plans. All areas would be intensively monitored for vegetation, aquatic habitat, and erosion conditions.

Coal. Coal development would be considered on a site-specific basis after consultation with affected entities and formulation of mitigating measures.

Mineral Materials. Federal mineral estate would be closed to disposal of mineral materials except for sales which would result in negligible or no impacts to the riparian and aquatic systems.

Soils and Water Resources. Non-conflicting erosion control and water quality improvement objectives and projects would be incorporated into new riparian/aquatic system management plans.

Wildlife Habitat. Non-conflicting wildlife habitat management objectives, projects, and mitigating measures would be incorporated into new riparian/aquatic system management plans.

Livestock Grazing. Livestock grazing use would be permitted in riparian zones except from March 1 through range readiness, during which time it would be eliminated to accelerate improvement of riparian vegetation. To improve the condition of riparian zones, management practices and principles would be established in activity plans. Utilization of 35 percent by weight of key forage species will be used as a general guidance for improvement; this may vary depending on the individual riparian system. Trailing use would be limited as much as possible and confined to established roads, and trailing livestock would not be permitted to bed in riparian zones unless absolutely necessary.

Forestry. Woodland product harvests would not be permitted in the management unit.

Off-Road Vehicles. A total of 680 acres in Roubideau and Potter creeks would be closed to ORV use. Vehicle use in the remainder of the management unit would be limited to designated roads and trails yearlong.

Major Utilities. The management unit would be open to development of major utility facilities. Surface-disturbing activities which would have long-term adverse effects on riparian/aquatic systems would be prohibited.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary for effective management of riparian/aquatic systems would be acquired through exchange only.

Access. Public access would be acquired into the Terror Creek area for project development and recreation purposes. The Potter Creek road (five miles) and the Dry Fork of Escalante Creek road (two miles) would be closed and rehabilitated and removed from the transportation plan.

Fire Management. A total of 3,082 acres of public land would be managed under the fire suppression category, with 1,607 acres identified for intensive suppression and 1,475 acres identified for conditional suppression. A total of 3,238 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 10

3,292 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 10 consists of two tracts in the High Park/Storm King Peak area 20 miles southeast of Montrose. The management unit (3,292 acres of public land) ranges from 8,500 feet to over 10,000 feet in elevation, and is used extensively as an elk calving area in the spring. The largest commercial timber stands in the planning area exist in this unit.

The management unit would be managed to enhance its use as an elk calving area. Any disturbance during the calving season (May 1 through June 15) would be limited as much as possible. Habitat in elk calving areas would be improved, and wildlife would have first priority for allocation of new forage.

Oil and Gas. Federal oil and gas estate (3,292 acres of federal surface and 1,423 acres of split-estate lands) would be open to leasing with a seasonal stipulation on seismic and drilling activities in effect from May 1 through June 15 to prevent disturbance of calving elk. Variances to this

seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Soils and Water Resources. Stipulations designd is used extensively as an elk calving area in the spring. The largest commercial timber stands in the planning area exist in this unit.

Forestry. Skid trails and other roads would be closed and rehabilitated; main haul roads would remain available for public use.

Off-Road Vehicles. The management unit would be open to ORV use except during the elk calving season when all roads would be closed. Access for maintenance of the existing communications site would be permitted at all times.

Major Utilities. Public lands would be open to development of major utility facilities but no surface-disturbing activities would be permitted during the elk calving season.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would expand elk calving areas and improve extensive recreational opportunities would be acquired through exchange only.

Access. Public access would be acquired into the Storm King and High Park areas for timber harvest and extensive recreation purposes.

Fire Management. A total of 3,292 acres of public land would be managed under the fire suppression category and identified as intensive suppression areas.

MANAGEMENT UNIT 11

1,990 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 11 is comprised of 1,990 acres of public land adjacent to the Gunnison River west of Delta. It adjoins the Escalante State Wildlife Area which is administered by the Colorado DOW. The management unit presently receives considerable use by waterfowl as nesting and resting habitat. Additional management and minor developments could enhance its potential for increased use as waterfowl habitat.

The management unit would be managed as waterfowl habitat. Adequate cover, wetlands, and nesting structures would be provided. Disturbance would be minimized during the breeding and nesting season (March 15 through June 30). Activities and land uses that are consistent with maintaining waterfowl habitat characteristics would be permitted. The BLM would coordinate management of the area with the DOW.

Oil and Gas. Federal oil and gas estate (1,990 acres of federal surface and 150 acres of split-estate lands) would be open to leasing with seasonal stipulations on seismic and drilling activities in effect from March 15 through June 30 to protect waterfowl habitat, and from December 1 through April 30 on habitat used for hunting by bald eagles. Variances to the seasonal stipulations may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. The BOR withdrawal and the BLM powersite classifications in this management unit would be recommended for revocation and opening to permit mineral exploration and development, facilitate resource management, and permit long-term land use planning. Federal mineral estate would be opened to entry and location.

Mineral Materials. Federal mineral estate would be open to disposal of mineral materials except during the waterfowl nesting season.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary to increase waterfowl habitat and facilitate development and management of the area would be acquired through exchange only.

Fire Management. The entire management unit (1,990 acres) would be managed under the fire suppression category and identified as a conditional suppression area.

MANAGEMENT UNIT 12

1,895 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 12 is 1,895 acres of public land in Escalante Canyon approximately six miles southwest of the Gunnison River. Several listed plant species and two unique plant associations occur in the management unit. The area also receives significant recreational use due to its scenic qualities and the presence of eroded potholes in Escalante Creek.

The management unit would be designated as the Escalante Canyon Area of Critical Environmental Concern (ACEC). This designation would enhance management and protection of the listed plant species and unique plant associations, and would improve the public's awareness of the recreational hazards of the Escalante Potholes. Plant monitoring studies would be developed and activities designed to improve these plants' habitat conditions would be initiated. Surface-disturbing activities would be restricted. Informational signs identifying potential recreational hazards would be provided. Camping would be limited to designated areas.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Locatable Minerals. The management unit would be withdrawn from entry and location for locatable minerals.

Mineral Materials. The management unit would be closed to disposal of mineral materials to protect the potential habitats of listed species and unique plant associations.

Livestock Grazing. Livestock grazing would continue at current levels unless studies determine threatened and endangered plant species and unique plant associations or their potential habitats are being degraded.

Forestry. To prevent accidental destruction of listed species and unique plant associations, woodland harvests would not be permitted.

Off-Road Vehicles. To prevent accidental destruction of listed species and unique plant associations, vehicle use within the management unit would be limited to designated roads and trails yearlong.

Visual Resources. The management unit would be managed under VRM Class II guidelines to maintain its scenic qualities.

Major Utilities. The management unit would be closed to development of major utilities to prevent accidental destruction of listed species and unique plant associations, and to maintain its scenic qualities.

Fire Management. All 1,895 acres of public surface in the management unit would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed.

MANAGEMENT UNIT 13

377 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 13 consists of two tracts totalling 377 acres of public land eight miles east of Montrose. The smaller tract is north of Highway 50 and the larger tract is south of the highway. The tracts contain the largest population of the endangered clay-loving wild buckwheat in the planning area and also have significant populations of Montrose penstemon, a candidate species.

The management unit would be designated as the Fairview Research Natural Area, an area of critical environmental concern (RNA/ACEC). Plant monitoring studies would be developed in cooperation with the Colorado Natural Areas Program and actions designed to improve habitat conditions would be initiated. Surface-disturbing activities would be restricted to protect the threatened and endangered species and their potential habitat.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Locatable Minerals. The management unit would be withdrawn from entry and location for locatable minerals.

Mineral Materials. The management unit would be closed to disposal of mineral materials to prevent accidental destruction of threatened or endangered plant species or their potential habitat.

Livestock Grazing. Livestock grazing would continue at current levels unless studies determine threatened and endangered plant species or their potential habitats are being degraded.

Off-Road Vehicles. To prevent accidental destruction of threatened or endangered plant species or their potential habitat, the management unit would be closed to ORV use.

Major Utilities. The management unit would be open to development of major utility facilities, except pipelines, so long as there would be no disturbance of threatened or endangered plant species or their potential habitat.

Fire Management. The management unit (377 acres) would be managed under the fire suppression category and identified for conditional suppression.

MANAGEMENT UNIT 14

80 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 14 is an 80-acre site consisting mainly of a volcanic structure with high-value scientific, interpretive, and scenic characteristics. A shelter facility and interpretive nature trail have been developed in the area. Needle Rock is part of the Colorado Natural Areas Program and is one of the significant public land geologic features in Colorado as identified by the BLM's Geologic Advisory Group.

The management unit would be designated as the Needle Rock Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC). This designation would preclude all surface-disturbing activities that are not consistent with management of the area for natural, scenic, and educational values. The area would be managed to protect these values and for recreation opportunities (sightseeing, picnicking, and geologic study) in a roaded but natural environment. A management plan would be developed following designation.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Locatable Minerals. The management unit would remain withdrawn from entry and location for locatable minerals.

Mineral Materials. The management unit would be closed to disposal of mineral materials.

Livestock Grazing. The management unit would remain unallotted for livestock grazing use.

Off-Road Vehicles. Vehicle use within the management unit would be limited to designated roads and trails yearlong.

PROPOSED PLAN

Visual Resources. The management unit would be managed under VRM Class I guidelines.

Major Utilities. The management unit would be closed to development of major utility facilities.

Fire Management. The entire management unit would be managed under the fire suppression category and identified as an intensive suppression area.

MANAGEMENT UNIT 15

6,783 Acres of Public Surface; 1 percent of the Planning Area

Management Unit 15 consists of 6,783 acres of public land approximately three miles northwest of Delta, Colorado. This area, commonly known as "the adobes", consists of Mancos shale hills and flats which, through wind and water erosion, have formed unique scenic formations. The unit's soils are highly erodible and saline. Spring and summer storms frequently result in high sediment loads and very saline runoff.

The management unit also contains populations of the threatened Uinta Basin hookless cactus and is potential habitat for the endangered clay-loving wild buckwheat and the candidate Montrose penstemon.

The management unit would be designated as the Adobe Badlands Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC). The area would be managed to protect its unique scenic qualities and threatened and endangered species' habitats, and to reduce active erosion.

The management unit would be protected from surface-disturbing activities which would degrade the area's scenic qualities and accelerate erosion. A complete inventory for threatened and endangered species would be conducted. Forage utilization would be managed to achieve a basal ground cover of 10 percent.

Coal. Federal coal estate would be closed to leasing.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Mineral Materials. The management unit would be closed to the disposal of mineral materials.

Soils and Water Resources. Erosion and salinity control measures would not utilize structures or land treatments which would alter scenic values.

Threatened and Endangered Species. A complete inventory for threatened and endangered species would be conducted. Research and monitoring studies would be established.

Wildlife Habitat. Wildlife forage allocations would remain at current levels. No additional forage allocations would be made. To protect scenic values, no new habitat improvement projects or maintenance of existing projects would be permitted.

Livestock Grazing. Livestock grazing would continue at current levels unless studies determine threatened and endangered plant species or their potential habitat are being degraded. If basal groundcover is less than 10 percent, livestock forage utilization would be managed at 35 percent utilization of key forage species. No additional forage allocations would be made. To protect scenic values, no new livestock improvement projects or maintenance of existing projects would be permitted.

Recreation. The unit would be managed for primitive non-motorized recreational use.

Off-Road Vehicles. The unit would be closed to ORV use to protect the scenic qualities and to prevent accidental destruction of threatened and endangered plant species and their potential habitat.

Visual Resources. To maintain its scenic qualities, the unit would be managed under VRM Class I guidelines.

Major Utilities. The unit would be closed to the development of major utility facilities to prevent accidental destruction of threatened and endangered species and to maintain its scenic qualities.

Fire Management. The unit would be managed under the fire suppression category and identified for conditional suppression.

MANAGEMENT UNIT 16

48,422 Acres of Public Surface; 10 percent of the Planning Area

In general, the public lands in Management Unit 16 (48,422 acres) would be managed according to the policy assumptions and standard resource program management guidance developed for this Proposed Plan. No single resource or resource use would have management priority. No activity plans would be written and no major BLM-funded projects or facilities would be developed within this area. Habitat, vegetation, and other resource studies would be minimal. Specific resource management in this area would be prescribed as follows.

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from December 1 through April 30 on 1,042 acres of federal surface along the Gunnison and North Fork of the Gunnison rivers that are used by bald eagles as hunting habitat. Variances to the seasonal

stipulation may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. The BOR withdrawals on Fruitland Mesa and along the Gunnison River downstream of Delta would be recommended for revocation to allow for mineral exploration and development, facilitate resource management, permit long-term land use planning, and allow for disposal of 806 acres of public land on Fruitland Mesa. Withdrawals on all other lands identified for disposal would be recommended for revocation. Portions of withdrawals in the management unit would be affected, including those associated with 108 acres of the Paonia Project, 37 acres of the Gunnison/Arkansas Project, 72 acres of the Uncompahgre Valley Project, and 25 acres along the East Canal. Federal mineral estate would be open to entry and location after a withdrawal is revoked.

Forestry. The reserved federal timber (123 acres) on 160 acres of land deeded to the Girl Scouts of America would be removed from the timber base and not considered for harvest. The management and harvest of this timber would be inconsistent with use of the land as a Girl Scout camp.

Off-Road Vehicles. Public lands within the management unit would be open to ORV use.

Fire Management. A total of 48,422 acres of public land would be managed under the fire suppression category, with 12,401 acres identified for intensive suppression and 36,021 acres identified for conditional suppression.

COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

Table 7 is a composite summary of the data presented in the prescriptions for the Continuation of Current Management Alternative, the Production Alternative, the Conservation Alternative (all of which are described in Chapter Three of the Draft RMP/EIS), and the Proposed Management Plan. The table summarizes by resource or resource use the major land use allocations that would be made under each management alternative and under the proposed plan. The purpose of this comparison is to identify major differences between the alternatives and the proposed plan, and to provide a clearer basis for management recommendations.

Table 7

COMPARISON OF THE RESOURCE MANAGEMENT ALTERNATIVES AND THE PROPOSED RESOURCE MANAGEMENT PLAN

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
COAL	Allow coal development on all areas not excluded from leasing. Consider coal leasing on a demand basis; apply unsuitability criteria and resource screening.	Continue with 26 existing coal leases on 26,663 acres and identify 20,737 acres of federal coal estate in the Paonia/Somerset and Cimarron Ridge coal areas as acceptable for further leasing for maintenance and emergency purposes.	Continue with 26 existing coal leases on 26,663 acres and identify 83,334 acres of federal coal estate in the Paonia/Somerset, Cimarron Ridge, and Bookcliffs coal areas as acceptable for further coal leasing with limited stipulations.	Continue with 26 existing coal leases on 26,663 acres and identify 82,827 acres of federal coal estate in the Paonia/Somerset, Cimarron Ridge, and Bookcliffs coal areas as acceptable for further coal leasing. A no surface disturbance restriction would apply on 6,288 acres of public land and restrictions on surface disturbance and on subsidence activities would apply on another 1,525 acres.	Continue with 26 existing coal leases on 26,663 acres and identify 83,334 acres of federal coal estate in the Paonia/Somerset, Cimarron Ridge, and Bookcliffs coal areas as acceptable for further coal leasing with limited stipulations.
OIL, GAS, AND GEOTHERMAL RESOURCES	Allow development of oil, gas, and geothermal resources on all areas not excluded from leasing.	Allow leasing of oil, gas, and geothermal resources on 445,364 acres with standard lease terms; on 31,200 acres on a case-by-case basis; on 220 acres with a no surface occupancy stipulation; and on 229,950 acres with seasonal stipulations.	Allow leasing of oil, gas, and geothermal resources on 706,654 acres with standard lease terms. The Needle Rock ONA/ACEC (80 acres) would be managed with a no surface occupancy stipulation.	Allow leasing of oil, gas, and geothermal resources on 367,488 acres with standard lease terms; on 29,915 acres with a no surface occupancy stipulation; and on 267,466 acres with seasonal stipulations. Three areas recommended as wilderness (41,865 acres) would be closed to leasing.	Allow leasing of oil, gas, and geothermal resources on 484,349 acres with standard lease terms; on 9,135 acres with a no surface occupancy stipulation; and on 192,212 acres with seasonal stipulations. The Gunnison Gorge WSA (21,038 acres), recommended as wilderness, would be closed to leasing.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
LOCATABLE MINERALS	Allow development of locatable minerals on all areas not closed to mineral entry and location.	Allow mineral entry and location on 615,892 acres. Current withdrawals totalling 59,250 acres are closed to entry and location.	Recommend revocation of all withdrawals on public lands (59,250 acres) and allow entry and location on the entire federal mineral estate (675,142 acres).	Recommend retention of all existing withdrawals (59,250 acres); withdraw an additional 39,602 acres from entry; allow entry and location on the remaining federal mineral estate (576,290 acres).	Recommend retention of all existing withdrawals on 9,440 acres; close the Gunnison Gorge WSA, the Escalante Canyon ACEC and the Fairview RNA/ACEC to mineral entry and location (23,310 acres); allow entry and location on the remaining federal mineral estate (642,392 acres).
MINERAL MATERIALS	Allow disposal of mineral materials on all areas not excluded or withdrawn.	Allow disposal of mineral materials on all public lands with federal mineral estate (480,805 acres). Disposal of mineral materials on 59,250 of these acres currently under withdrawal would require the approval of the withdrawing agency. Disposal of mineral materials would not be permitted on 220 acres.	Allow disposal of mineral materials on 480,945 acres with federal mineral estate. The Needle Rock ONA/ACEC (80 acres) would be closed to disposal of mineral materials.	Allow disposal of mineral materials on 396,264 acres with federal mineral estate. Disposal on 196,700 of these acres would be subject to seasonal restrictions. Disposal on 98,852 of these acres would require the approval of the withdrawing agency. Disposal would not be permitted on 84,761 acres.	Allow disposal of mineral materials on 444,532 acres with federal mineral estate. Disposal on 63,174 of these acres would be subject to seasonal restrictions. Disposal on 9,360 of these acres would require the approval of the withdrawing agency. Disposal would not be permitted on 36,493 acres.
SOILS AND WATER RESOURCES	Establish water quality studies throughout the planning area.	Continue intensive management and development of the Elephant Skin Wash watershed (2,370 acres) to control salinity.	No public lands would be intensively managed for salinity and/or erosion control.	Public lands totalling 21,615 acres would be intensively managed to control erosion and 26,580 acres would be intensively managed to control salinity. Projects and special protective measures would be developed.	Public lands totelling 26,547 acres, including the Elephant Skin Wash project, would be intensively managed to reduce salinity loads in the upper Colorado River. Appropriate projects and special protective measures would be developed.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	**Production Alternative**	**Conservation Alternative**	**Proposed Plan**
		Require mitigation to minimize erosion and water quality deterioration in plans for surface disturbing activities. Maintenance of existing projects would have priority over implementation of new projects.	Projects would be developed to control salinity on 7,810 acres if compatible with livestock grazing use. Projects would be developed to reduce runoff, erosion, and sediment on 27,430 acres if compatible with livestock grazing use, crucial deer and elk winter range, and forest management.	Projects would be developed to control salinity on 29,978 acres and erosion on 21,703 acres if compatible with recreation, T&E species, and cultural resource management.	Projects would be developed to reduce runoff, erosion, and sediment on 47,260 acres if compatible with livestock grazing use, forest management, deer and elk winter range, and riparian habitat management.
RIPARIAN ZONES	Continue to inventory and monitor riparian areas.	Improve the vegetation condition on 3,500 acres of riparian zones through decreased livestock utilization and trampling. Maintain riparian zones in the remainder of the planning area in their present condition.	Maintain riparian zones in the planning area in their present condition so long as it does not interfere with other resource uses and needs.	Improve the vegetation condition on 6,385 acres of riparian zones by implementing special protective and restorative measures. Maintain riparian zones in the remainder of the planning area in their present condition.	Improve the vegetation condition on 6,320 acres of riparian zones by implementing special protective and restorative measures. Maintain or improve riparian zones in the remainder of the planning area.
THREATENED AND ENDANGERED SPECIES	Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USFWS.	Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.	Require minimal measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.	Require additional measures beyond minimal requirements to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.	Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities.
		Maintain suitable habitat for bald eagles and river otters in the Gunnison Gorge area.			Maintain suitable habitat for bald eagles, peregrine falcons, and river otters in the Gunnison Gorge area.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
				Designate one ACEC and one RNA/ACEC, totalling 2,272 acres, for protection of T&E plants and unique plant associations.	Designate one ACEC, one RNA/ACEC, and one ONA/ACEC, totalling 9,055 acres for protection of T&E plants, unique plant associations, and identification of recreational hazards.
WILDLIFE HABITAT	Monitoring of both terrestrial and aquatic wildlife habitat would continue. In-channel structures and improvements to benefit aquatic wildlife habitat would be implemented.	Maintain big game forage allocations at present levels; future increases/ decreases would be divided evenly between big game and livestock.	Maintain big game forage allocations at present levels; no future additional forage would be allocated to big game.	Maintain big game forage allocations at present levels; all future additional forage would be allocated to big game.	Maintain big game forage allocations at present levels. Big game would have priority for future additional forage on 72,342 acres; future additional forage on another 193,612 acres would be divided evenly between big game and livestock. No additional forage would be allocated on the Adobe Badlands ONA/ACEC (6,783 acres).
		Protect and mitigate wildlife habitat and improve browse condition on crucial deer and elk ranges.	Non-conflicting wildlife habitat management objectives and projects would be incorporated into future livestock grazing and forest management plans. Existing wildlife projects would be maintained as long as the timber and woodland base on 27,522 acres would not be decreased.	Intensively manage habitat and minimize disturbance on all crucial deer and elk winter ranges, elk calving areas (High Park), antelope ranges (Wells Gulch/ Cactus Park), sage grouse habitats (Fruitland and Simms mesa), in several proposed waterfowl areas, and aquatic wildlife habitat in seven drainages. No vegetation manipulation would be permitted on 2,738 acres of cultural resource sites.	Intensively manage habitat and minimize disturbance on 67,320 acres of important deer and elk winter range. Intensively manage and protect 3,292 acres in the Storm King Peak area for elk calving habitat.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
		Continue cooperative management effort with the DOW to benefit deer and elk in the Billy Creek area.		Continue cooperative management effort with the DOW to benefit deer and elk in the Billy Creek area.	
		Manage habitat in the Gunnison Gorge for 150 bighorn sheep.	Manage habitat in the Gunnison Gorge for 150 bighorn sheep. Allow reintroduction of bighorn sheep into the Camel Back area so long as livestock forage needs are not impacted.	Allocate forage, minimize disturbance, and manage habitat in the Gunnison Gorge and Camel Back areas for bighorn sheep.	Manage habitat and minimize disturbance in the Gunnison Gorge and Camel Back areas for bighorn sheep.
		Continue management of the Gunnison Forks HMP area for fisheries and wildlife habitat benefits.	Revise the Gunnison Forks HMP to restrict ORV and other recreation use, and to accommodate livestock grazing and oil and gas activities.	Continue management of the Gunnison Forks HMP area for fisheries and wildlife habitat benefits.	Intensively manage and improve 1,990 acres along the Gunnison River for waterfowl habitat. Intensively manage 70 miles of streams for restoration and protection of aquatic habitats.
LIVESTOCK GRAZING	Develop AMPs for "I" category grazing allotments if no plan exists. Maintain existing AMPs on "M" "C" allotments. Continue monitoring on all allotments, with emphasis on "I" allotments.	Allow intensive management on 353,068 acres of "I" allotments; maintain current conditions on 65,497 acres of "M" allotments; manage 38,900 acres as "C" allotments. Manage 25,612 acres as unallotted; authorize no grazing use on currently unallotted areas.	Allow intensive management on 353,068 acres of "I" allotments; maintain current conditions on 65,497 acres of "M" allotments; manage 58,695 acres as "C" allotments (includes suitable existing unallotted areas). Manage 5,817 acres as unallotted areas.	Allow intensive management on 350,796 acres of "I" allotments; maintain current conditions on 65,497 acres of "M" allotments; manage 38,433 acres as "C" allotments. Manage 28,351 acres as unallotted; all unallotted areas would remain unallotted.	Allow intensive management on 336,562 acres of "I" allotments; maintain current conditions on 74,817 acres of "M" allotments; manage 39,033 acres as "C" allotments. Suitable unallotted public lands (26,873 acres) could be considered for grazing use authorizations except on areas where big game has priority for forage allocations.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	**Production Alternative**	**Conservation Alternative**	**Proposed Plan**
		Manage at present forage allocation levels; future forage increases would be divided evenly between livestock and big game.	Manage at present forage allocation levels; future forage increases would be allocated to livestock.	Manage for no additional forage allocations to livestock.	Manage at present forage allocation levels. Future additional forage would be allocated to livestock on 186,810 acres, and divided evenly between livestock and big game on 193,612 acres. No additional forage would be allocated on the Adobe Badlands ONA/ACEC (6,783 acres).
		Implement projects and land treatments to meet AMP objectives with restrictions protecting other resource needs.	Implement projects and land treatments to meet AMP objectives with minimal restrictions.	Land treatments and facility developments would be restricted on 124,963 acres.	Land treatments and facility developments would be restricted on 151,690 acres.
		Livestock grazing use would be in accordance with the Uncompahgre Basin RPS and its updates.	Livestock grazing use would be restricted on adobe soils (9,201 acres) during the spring.	Livestock grazing use would be eliminated on 3,059 acres and restricted (season of use, utilization) on 75,626 acres.	No livestock grazing use would be allowed on 5,792 acres due to RMP decisions and unsuitability for grazing. Livestock grazing authorizations are unlikely on an additional 6,967 acres because of future wildlife forage needs. Livestock grazing would be restricted (season of use, utilization) on 39,590 acres.
FORESTRY	Manage both commercial forest and suitable woodlands for sustained yield production with harvest restrictions determined	Commercial forest on 3,482 acres (257 MBF/year) and suitable woodlands on 6,536 acres (327 cords/year) would be managed for sustained yield pro-	Commercial forest on 2,001 acres (148 MBF/year) and suitable woodlands on 7,072 acres (353 cords/year) would be managed for sustained yield pro-	Commercial forest on 2,251 acres (166.5 MBF/year) and suitable woodlands on 31,997 acres (1,600 cords/year) would be managed for sustained	Commercial forest on 3,127 acres (231.5 MBF/year) and suitable woodlands on 24,255 acres (1,213 cords/year) would be managed for sustained

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
	by the TPCC inventory.	duction. Seasonal restrictions would be applied on a case-by-case basis.	duction with no seasonal restrictions.	yield production. Seasonal restrictions would apply on 1,263 acres of commercial forest.	yield production. Seasonal restrictions would apply on 1,606 acres of commercial forest.
RECREATION	Manage the Gunnison Gorge SRMA in accordance with its RAMP. Continue to manage the Needle Rock ONA/ACEC and develop a management plan.	Continue management of the the Gunnison Gorge recreation area (61,067 acres) for motorized and non-motorized recreation opportunities.	Manage the inner Gunnison Gorge (21,038 acres) for intensive recreation use.	Manage the Gunnison Gorge recreation area (40,792 acres) for motorized and non-motorized recreation opportunities.	Manage the Gunnison Gorge recreation area (40,792 acres) for motorized and non-motorized recreation opportunities.
		Manage whitewater boating use in the Gunnison Gorge for a maximum of 10 group encounters per day. Commercial overnight trips would be limited to 2 per day. Unrestricted day-use would not exceed 10 group encounters per day.	Manage whitewater boating use in the Gunnison Gorge for a maximum of 20 group encounters per day, with 8 overnight and 12 day-use permits issued daily (one-half commercial; one-half private).	Manage the Gunnison Gorge WSA (21,038 acres) for wilderness values and whitewater boating opportunities. Maximum boating use would be 6 group encounters per day, with 3 overnight and 3 day-use permits issued daily (one-third commercial; two-thirds private).	Until a decision is made on wilderness designation or non-designation, manage the Gunnison Gorge WSA (21,038 acres) for non-motorized recreation and whitewater boating opportunities. Boating use would be limited to 6 to 10 group encounters per day with no more than one commercial trip starting per day.
		Manage the remainder of the planning area for extensive recreation use.	Manage the lower Gunnison River, below Escalante Bridge, as an SRMA and develop river access.	Manage the lower Gunnison River, below Escalante Bridge, as an SRMA for boating opportunities.	Manage the lower Gunnison River, below Escalante Bridge, for boating opportunities. Develop river access and provide maps and information.
			Manage the remainder of the planning area for extensive recreation use.	Restrict recreation use to primitive walk-in access in the Escalante Canyon RNA/ACEC.	Manage and develop the Escalante Canyon ACEC for recreation use that does not conflict with T&E plants and unique plant associations. Manage the

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
					Adobe Badlands ONA/ACEC for its scenic qualities and for non-motorized recreation opportunities.
				Manage the North Delta adobe area (8,942 acres) as an SRMA for ORV use.	Manage the North Delta adobe area (8,942 acres) for ORV use.
				Manage the Storm King Peak area (1,520 acres) for possible development of a commercial ski area.	Manage the remainder of the planning area for extensive recreation use.
				Manage the remainder of the planning area for extensive recreation use.	
OFF-ROAD VEHICLES		A total of 444,521 acres would be open to ORV use and 21,038 acres would be closed to ORV use. Vehicle use would be limited to designated roads and trails on 17,518 acres.	A total of 208,952 acres would be open to ORV use and 35 acres would be closed to ORV use. Vehicle use on 49,840 acres would be limited to designated roads and trails yearlong and another 224,250 acres would have seasonal limited designations.	A total of 151,000 acres would be open to ORV use and 44,137 acres would be closed to ORV use. Vehicle use on 147,059 acres would be limited to designated roads and trails yearlong and another 140,881 acres would have seasonal limited designations.	A total of 224,276 acres would be open to ORV use and 38,600 acres would be closed to ORV use. Vehicle use on 56,974 acres would be limited to designated roads and trails yearlong and another 163,227 acres would have seasonal limited designations.
CULTURAL RESOURCES	Continue to inventory and monitor cultural resource sites; require clearances for all surface disturbing activities.	Perform necessary stabilization, restoration, and interpretation of sites in the Gunnison Gorge Recreation Area.	Conduct a Class III inventory on 2,738 acres.	Temporarily manage 2,738 acres as Current Scientific Use Areas. Allow no projects or land treatments. Conduct a Class III inventory and protect cultural values in	Conduct a Class III inventory on 5,848 acres. Some high-value sites could be assigned a long-term protective classification.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
				the area. High-value sites would be assigned a long-term protective classification.	
VISUAL RESOURCES		Visual resource management would be under current VRM classifications: Class I - 80 acres, Class II - 64,800 acres, Class III - 46,580 acres, Class IV- 371,617 acres.	Visual resource management would be: Class I - 80 acres, Class II - 64,800 acres, Class III - 46,580 acres, Class IV - 371,617 acres.	Visual resource management would be: Class I - 43,807 acres, Class II - 47,852 acres, Class III - 37,355 acres, Class IV - 354,063 acres.	Visual resource management would be: Class I - 27,901 acres, Class II - 27,384 acres, Class III - 293,417 acres, Class IV - 134,375 acres.
WILDERNESS		Recommend all three WSAs (41,865 acres) as non-suitable for wilderness designation.	Recommend all three WSAs (41,865 acres) as non-suitable for wilderness designation.	Recommend all three WSAs (41,865 acres) as suitable for wilderness designation.	Recommend the Gunnison Gorge WSA (21,038 acres) as suitable for wilderness designation. Recommend both the Camel Back WSA (10,402 acres) and the Adobe Badlands WSA (10,425 acres) as non-suitable for wilderness designation.
		Manage all three areas under a general multiple-use policy. The Gunnison Gorge area would be managed with emphasis on recreation and habitat for T&E animal species.	Manage all three areas with emphasis on livestock grazing and mineral exploration. The protective withdrawal would be lifted on the Gunnison Gorge. The area would be managed for possible hydroelectric development.		Manage the Camel Back area with emphasis on riparian/aquatic system management, wildlife habitat, and livestock grazing. Close the entire area to ORV use. Manage 6,783 acres of the Adobe Badlands WSA as an ONA/ACEC to protect the scenic qualities and T&E plants, and to reduce active erosion. Manage the remainder of the Adobe Badlands WSA (3,642 acres) as wildlife habitat.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
MAJOR UTILITIES		Public lands on 421,930 acres would be open to development of major utilities; 40,029 acres would be open but not preferred for utility development; 21,118 acres would be excluded from utility development.	Public lands on 449,597 acres would be open to development of major utilities; 33,480 acres would be excluded from utility development.	Public lands on 106,851 acres would be open to development of major utilities; 32,356 acres would be open but not preferred for utility development; 69,906 acres would be excluded from utility development. Special stipulations would restrict utility development on 273,964 acres.	Public lands on 301,006 acres would be open to development of major utilities; 82,038 acres would be excluded from utility development. Special stipulations would restrict utility development on 100,033 acres.
LAND TENURE ADJUSTMENT	As opportunities are presented, primarily through exchange, pursue acquisition of non-federal lands which would meet established criteria and enhance resource management within management units.	Consider 19 tracts of public land totalling 830.25 acres as suitable for disposal.	Consider 171 tracts of public land totalling 29,496 acres as suitable for disposal.	Consider no public lands as suitable for disposal.	Consider 143 tracts of public land totalling 11,026 acres as suitable for disposal.
		Pursue acquisition of 2,200 acres of private land in the Gunnison Gorge Recreation Area.	Pursue acquisition of 3,640 acres of Colorado DOW land in the Escalante Creek area and available private land near Dry Creek and along the lower Gunnison River below the Roubideau Creek confluence in proposed waterfowl areas.	Pursue acquisition of 2,200 acres of private land in the Gunnison Gorge Recreation Area and 320 acres of private land in and adjacent to the Camel Back WSA. Pursue acquisition of private lands in proposed waterfowl areas, in riparian zones, and in crucial deer and elk winter ranges.	Pursue acquisition, primarily through exchange, of private lands which meet established criteria and enhance resource management within management units.
ACCESS		Acquire public road access into 14 areas and public trail access into one area.	Acquire public road access into 13 areas.	Acquire public road access into 7 areas.	Acquire public road access into 15 areas and public trail access into one area.

Table 7 (continued)

RESOURCE/ RESOURCE USE	GENERAL GUIDANCE	MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN			
		Continuation of Current Management Alternative	Production Alternative	Conservation Alternative	Proposed Plan
FIRE MANAGEMENT		All public lands in the planning area (483,077 acres) would have full and immediate fire suppression, with safety and cost-effectiveness considerations.	Public lands totalling 112,945 acres would have intensive fire suppression; 201,799 acres would have conditional fire suppression. Prescribed fire would be permitted on 168,333 acres.	Public lands totalling 112,945 acres would have intensive fire suppression; 201,799 acres would have conditional fire suppression. Prescribed fire would be permitted on 168,333 acres.	Public lands totalling 110,252 acres would have intensive fire suppression; 202,895 acres would have conditional fire suppression. Prescribed fire would be permitted on 169,930 acres.

IMPACTS OF THE PROPOSED PLAN

This section describes the physical, biological, and economic consequences of implementing the Proposed Resource Management Plan.

Only those resources which would be impacted as a result of implementation of the proposed management actions are discussed. Topography, geology, and prime and unique farmlands would not be impacted by the BLM's proposed plan and are therefore not discussed.

Both adverse and beneficial impacts, based on the effects of proposed management actions, were analyzed. The impact analyses also reflect a comparison of these environmental consequences with the affected environment (Chapter Two of the Draft RMP/EIS).

Mitigating measures designed to avoid or reduce environmental impacts were incorporated into the proposed plan. Identified impacts are considered unavoidable given the prescribed mitigation.

An interdisciplinary approach was used in developing and analyzing environmental consequences. The general assumptions and guidelines which defined the process included:

1. Only significant changes or impacts, which vary by resource, would be analyzed.

2. Changes or impacts described are short-term unless otherwise stated. Short-term impacts would occur within the life of the proposed plan (10 to 12 years); long-term impacts would occur over a 20-year period.

3. Proposed management actions were analyzed under the assumption that the proposed plan would be fully implemented and that adequate funding and staffing would be available for implementation.

The analysis of the impacts of the proposed plan is subdivided by impacted resources or resource uses. Impacts are then described as (1) Impacts from Proposed Management Actions, and (2) Cumulative Impacts. (Where cumulative impacts are not presented separately, they would be the same as the impacts from proposed management actions.)

The impact analysis is presented as ***impacts on*** a resource/resource use that would ***result from*** a proposed management action or actions. For example, ***impacts on*** air quality would ***result from*** proposed off-road vehicle management.

IMPACTS ON AIR QUALITY

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Air Quality Management. Air pollution emissions from primary sources would be minimized through enforcement of applicable policies, regulations, and statutes.

Impacts from Wildlife Habitat and Livestock Grazing Management. Short-term localized impacts on air quality would result from vegetation manipulation practices. These minor impacts would be dispersed throughout the planning area.

Impacts from Off-Road Vehicle Management. Managing 80 percent of the planning area as open to ORV use for all or portions of the year would result in increased fugitive dust emissions due to vehicle-caused soil erosion. Allowing ORV use on 25,277 acres of highly erodible soils during critical soil moisture periods would significantly increase localized fugitive dust levels as recreational ORV use increases.

CUMULATIVE IMPACTS ON AIR QUALITY

Increased levels of air pollution are anticipated due to regional growth and development. No land-use allocations specified in this proposed plan would have significant long-term effects on air quality.

IMPACTS ON COAL

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Coal Management. Allowing continued development of coal on 26,663 acres of existing coal leases and identifying 83,334 acres of federal coal estate as acceptable for further coal leasing consideration could permit leasing and mining of up to 5,730 million tons of in-place coal. An additional 1,756 acres of federal coal reserves under private surface and bounded by the Gunnison National Forest would be managed to permit leasing consideration of 101 million tons of in-place coal.

The possible leasing of up to 5,730 million tons of coal would far exceed coal demand over the life of this plan as the 1985 coal production from Delta and Gunnison counties was 2.2 million tons and optimistic annual coal production forecasts for this area range from 4.5 to 7.35 million tons for the years 1990 to 2000. However, any increase in available coal would increase coal leasing opportunities for coal developers.

PROPOSED PLAN IMPACTS

Impacts from Oil and Gas Management. Leasing and subsequent development of oil and gas in the same areas identified as acceptable for further coal leasing consideration could reduce the amount of coal available for mining. This reduction would depend on the scope and timing of development of both resources and the amount of coal determined necessary to be left as pillars to protect oil and gas wells. No projections have been made on coal losses due to oil and gas well protection. However, there could be a conflict if the amount of coal required to be left in place would make the area uneconomical to mine.

Impacts from Riparian/Aquatic Systems Management. Requiring mitigating measures for surface disturbances within these areas would result in increased operating costs for coal companies.

Impacts from Wildlife Habitat Management. Not permitting new road and facility construction from December 1 through April 30 on 920 acres of deer and elk winter range could result in higher development costs and scheduling inconvenience for coal companies.

Impacts from Recreation Management. Closing 6,783 acres to coal leasing would have no impact since there are no coal resources within the Adobe Badlands ONA.

CUMULATIVE IMPACTS ON COAL

The proposed plan is not anticipated to impact coal production levels over the life of the plan. Restrictive management on portions of the coal planning areas would be likely to increase operating costs and result in scheduling inconvenience for coal companies. Under the proposed plan, 4,396 million tons of in-place federal coal (84,170 acres) would be acceptable for further coal leasing consideration and 48 million tons of in-place federal coal (920 acres) would be acceptable for further coal leasing consideration with stipulations. Development of 1,387 million tons of coal on 26,663 acres of existing coal leases would continue.

IMPACTS ON OIL AND GAS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Oil and Gas Management. Table 8 lists the acres of federal oil and gas estate in each leasing category, and Table 9 lists the acres under each leasing category by management unit. Managing 484,349 acres with standard lease terms would allow for exploration and development with few restrictions. Managing 176,076 acres of federal surface and 16,136 acres of split-estate lands with seasonal stipulations on surface occupancy could result in higher exploration, drilling, and development costs, along with scheduling inconvenience. Managing 5,872 acres with a no surface occupancy stipulation would increase drilling costs as directional drilling would be required. Although these acres are within the practical limits of directional drilling, any increased operating costs could lower the potential for production. For the purposes of this document, the practical limits of directional drilling are defined as being within 0.5 mile from the boundary of the management area.

Table 8
LAND IN EACH OIL AND GAS LEASING CATEGORY: PROPOSED PLAN

LEASE CATEGORY	ACRES
NO LEASING	
Federal Surface	21,038
STANDARD LEASE TERMS	
Federal Surface	276,828
Split-Estate	207,521
LEASING WITH STIPULATIONS	
No Surface Occupancy (NSO)	
- Federal surface	9,135
Seasonal	
- Federal surface	176,076
- Split-estate	16,136

Oil and gas development would be essentially foregone on 3,263 acres that are under no surface occupancy stipulations and beyond the practical limits of directional drilling. These 3,263 acres are determined to have moderate favorability for oil and gas accumulation.

Impacts from Coal Management. Coal mining could result in delays in drilling schedules, higher drilling and development costs, and requirements for use of special techniques and alternate drilling sites. Coal mining could damage existing wells and remove or reduce gas resources if potential gas producing zones were located within mineable coal beds.

Impacts from Soils and Water Resources Management. Managing 24,177 acres of federal surface and 4,155 acres of split-estate lands in the salinity control areas with seasonal stipulations (March 1 through May 31) could result in higher exploration, drilling, and development costs, along with scheduling inconvenience. This potential adverse impact would be most significant in the KGS areas where the probability of continued exploration and development is the greatest.

Table 9

MANAGEMENT OF OIL AND GAS LEASES BY MANAGEMENT UNIT: PROPOSED PLAN

MANAGEMENT UNIT	ACRES WITH STANDARD LEASE TERMS		ACRES WITH SEASONAL STIPULATIONS								ACRES WITH NO SURFACE OCCUPANCY STIPULATIONS	ACRES CLOSED TO LEASING
			12/1 to 4/30		3/15 to 6/30 12/1 to 4/30		5/1 to 6/15		3/1 to 5/31			
	Federal Surface	Split-Estate	Federal Surface	Split-Estate	Federal Surface	Split-Estate	Federal Surface	Split-Estate	Federal Surface	Split-Estate	Federal Surface	Federal Surface
1	118,238	20,897	68,572	623	—	—	—	—	—	—	—	—
2	30,313	13,645	37,007	8,850	—	—	—	—	—	—	—	—
3	19,055	67	28,552	25	—	—	—	—	—	—	—	—
4	32,715	970	8,077	280	—	—	—	—	—	—	—	—
5	—	—	—	—	—	—	—	—	24,177	4,155	—	—
6	—	—	—	—	—	—	—	—	—	—	—	21,038
7	13,865	28,515	3,367	630	—	—	—	—	—	—	—	—
8	8,942	—	—	—	—	—	—	—	—	—	—	—
9	6,320	—	—	—	—	—	—	—	—	—	—	—
10	—	—	—	—	—	—	3,292	1,423	—	—	—	—
11	—	—	—	—	1,990	150	—	—	—	—	—	—
12	—	—	—	—	—	—	—	—	—	—	1,895	—
13	—	—	—	—	—	—	—	—	—	—	377	—
14	—	—	—	—	—	—	—	—	—	—	80	—
15	—	—	—	—	—	—	—	—	—	—	6,783	—
16	47,380	143,427	1,042	—	—	—	—	—	—	—	—	—
TOTALS	276,828	207,521	146,617	10,408	1,990	150	3,292	1,423	24,177	4,155	9,135	21,038

PROPOSED PLAN IMPACTS

Impacts from Threatened and Endangered Species Management. Managing 2,272 acres of threatened and endangered species habitat and unique plant association areas with a no surface occupancy stipulation would result in higher drilling and development costs as directional drilling would be required.

Impacts from Wildlife Habitat Management. Managing 151,899 acres of federal surface and 11,981 acres of split-estate lands in crucial deer and elk winter range, bald eagle winter habitat, elk calving areas, and waterfowl habitat areas with seasonal stipulations could result in higher exploration, drilling, and development costs, along with scheduling inconvenience. This potential adverse impact would be most significant in the KGS areas where the probability of continued exploration and development is the greatest.

Impacts from Recreation Management. Managing the Needle Rock ONA/ACEC and the Adobe Badlands ONA/ACEC with a no surface occupancy stipulation would eliminate oil and gas production potential on 3,263 acres which are not suitable for directional drilling. This would also result in higher drilling and development costs on 3,600 acres where directional drilling would be required.

Impacts from Wilderness Management. The negative impact of closing the Gunnison Gorge WSA to leasing would be negligible as geologic structures in this area have no favorability for oil and gas accumulation.

CUMULATIVE IMPACTS ON OIL AND GAS

No surface occupancy stipulations within the Adobe Badlands ONA/ACEC would result in unquantifiable negative impacts on oil and gas development. These impacts would be expected to be moderate. The favorability for oil and gas is considered moderate based on the area's proximity to three KGS areas. Seasonal stipulations on 176,076 acres of federal surface and on 16,136 acres of split-estate lands and no surface occupancy stipulations on 9,135 acres of federal surface could increase exploration and development costs to the point of decreasing production potential throughout the planning area. Production potential would be eliminated on 3,263 acres managed under no surface occupancy stipulations that are beyond the practical limits of directional drilling. Overall, these negative impacts would be rated low to moderate since the entire planning area has a low to moderate favorability for oil and gas production.

IMPACTS ON LOCATABLE MINERALS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Locatable Minerals Management. Identifying 642,392 acres as open to mineral entry and location would make this area available for exploration and development under the general mining laws. Withdrawing 32,750 acres from mineral entry and location would eliminate these lands from possible mineral development. Table 10 lists the acres proposed for protective withdrawal.

Table 10

FEDERAL SURFACE/MINERALS WITHDRAWN FROM ENTRY TO PROTECT EACH LISTED RESOURCE: PROPOSED PLAN

RESOURCE REQUIRING PROTECTIVE WITHDRAWAL	ACRES WITHDRAWN
THREATENED AND ENDANGERED SPECIES	
Escalante Canyon ACEC	1,895
Fairview RNA/ACEC	377
RECREATION	
Needle Rock ONA/ACEC	80
WILDERNESS	
Gunnison Gorge WSA	21,038
OTHER	
Bureau of Reclamation withdrawals	9,360
TOTAL	32,750

The negative impact of withdrawing the Gunnison Gorge WSA from mineral entry and location would be low to moderate as geologic structures in the area have a moderate favorability for accumulation of locatable minerals. There are no known mineral deposits in the WSA. Approximately 20 lode claims and several prospects which are located within or adjacent to the WSA indicate some minerals interest in the local area.

Mining claimants with invalid claims located within the WSA would be adversely affected as development or extraction would be permitted only on claims proven to have valid mineral discoveries. In addition, the potential for mineral discoveries on lands unclaimed prior to wilderness designation would be eliminated.

Retaining the withdrawal on the 80-acre Needle Rock ONA/ACEC would have a low negative impact as there are no known mineral values within this area. Retaining the Bureau of Reclamation withdrawals on 9,360 acres would have an unknown impact as little data is available on mineral potentials within these areas. There are no known mineral values on these withdrawn lands and little interest has been expressed for mineral explorations.

The negative impacts of withdrawing the Escalante Canyon ACEC (1,895 acres) and Fairview RNA/ACEC (377 acres) from mineral entry and location would be low as geologic structures in these areas have a low favorability for accumulation of locatable minerals. There are no known locatable mineral deposits or evidence of past mineral development within these areas. The potential for economic discoveries is poor. There has been recent interest in possible placer deposits adjacent to the Fairview RNA/ACEC, but the future of this interest is speculative. Uranium and vanadium mineralization is considered likely within the Escalante Canyon ACEC but there are no known concentrations.

Managing the Adobe Badlands ONA/ACEC (6,783 acres) and 10,402 acres of recreation areas as closed to ORV use would result in increased operating costs and inconvenience for mining claimants as plans of operations would be required for all activities except casual use.

Disposal of public lands could result in management problems associated with split-estate lands.

IMPACTS ON MINERAL MATERIALS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Mineral Materials Management. Identifying 381,358 acres as open to disposal of mineral materials with no seasonal restrictions would make this resource available to the public and government entities on 79 percent of the planning area with a minimum of restrictions. Managing 63,174 acres with seasonal restrictions on disposal activities could result in scheduling inconvenience for operators. The impact of closing 36,493 acres to disposal of mineral materials would be low as there are numerous alternate sites available elsewhere in the planning area. In some circumstances, the costs of hauling mineral materials could be increased as closures could increase travel distances to open mineral material locations. Requiring approval of the withdrawing agency for disposal of mineral materials on 9,360 acres could result in the denial of permit applications for mineral materials on these lands.

Table 11 lists the federal surface in each mineral material disposal category by protected resource.

Table 11

FEDERAL SURFACE IN EACH MINERAL MATERIAL DISPOSAL CATEGORY BY PROTECTED RESOURCE: PROPOSED PLAN

RESOURCE REQUIRING PROTECTIVE CATEGORY	ACRES OPEN	ACRES WITH SEASONAL RESTRICTIONS 12/1 to 4/30	3/1 to 5/31	3/15 to 6/30	ACRES CLOSED
Federal surface with no restrictions required	381,358	—	—	—	—
SALINITY AREAS	—	—	24,177	—	—
RIPARIAN/AQUATIC AREAS	—	—	—	—	6,320
T&E SPECIES					
Escalante Canyon ACEC	—	—	—	—	1,895
Fairview RNA/ACEC	—	—	—	—	377
WILDLIFE HABITAT					
Deer/elk winter range	—	37,007	—	—	—
Waterfowl area	—	—	—	1,990	—
RECREATION					
Needle Rock ONA/ACEC	—	—	—	—	80
Adobe Badlands ONA/ACEC	—	—	—	—	6,783
WILDERNESS					
Gunnison Gorge WSA	—	—	—	—	21,038
TOTALS	381,358	37,007	24,177	1,990	36,493

PROPOSED PLAN IMPACTS

IMPACTS ON SOILS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Soils Management. Minimizing soil disturbance on all surface-disturbing activities would decrease potential losses of soil productivity. Permitting soil and watershed projects within 312,489 acres, of which 17,806 acres have soils that are determined to be highly erodible, would allow for mitigation of soil erosion as problem areas develop.

Impacts from Mineral Resources Management. Surface-disturbing activities would decrease soil productivity through soil compaction, erosion, mixing of soil horizons, and reduced soil moisture retention capabilities. Coal development could result in soil productivity losses on less than 1,000 acres due to road and facility placement and increased soil slumping and mud flows.

Development of oil and gas leases on 676,561 acres, locatable minerals on 642,392 acres, and mineral materials on 444,532 acres would decrease soil productivity unless rehabilitation efforts are successful. Development of locatable minerals within 69,389 acres of easily eroded soils during critical soil moisture periods (March 1 through May 31) would decrease soil productivity over the long-term. Similar impacts would result from development of oil and gas leases and mineral material areas within 41,288 acres of these soils. Accidental fluid discharges during drilling operations could also contaminate soils.

Impacts from Water Resources Management. Seasonal restrictions on surface-disturbing activities and potential livestock forage utilization limits on 30,960 acres of highly saline soils (Management Unit 5 and Management Unit 15) would decrease erosion and increase soil productivity within these areas. Developing in-channel structures and land treatments on 24,177 of these acres would further protect soils from erosion.

Impacts from Wildlife Habitat and Livestock Grazing Management. Intensively managing 336,562 acres of "I" category grazing allotments would reduce soil compaction and erosion rates over the long-term in these areas as AMP objectives to increase ground cover are achieved. Permitting grazing during soil moisture periods (March 1 through May 31) and forage utilization greater than 35 percent on 38,953 acres of easily eroded soils would result in soil productivity losses within these areas. Eliminating grazing from March 20 to range readiness and increasing basal ground cover on 24,177 acres (Management Unit 5), along with restricting forage utilization to 35 percent on 2,370 acres (Elephant Skin Wash area) would increase soil productivity and decrease long-term annual erosion rates by up to three tons per acre in these areas.

Short-term erosion would increase by one to ten times present levels on vegetation treatments designed to increase wildlife and livestock forage. Soil productivity would surpass present levels over the long-term as treatments increase basal ground cover.

Impacts from Forest Management. Road construction and surface disturbance from harvest activities would result in increased erosion. Erosion would decrease over time if harvests result in an increase in basal ground cover. Harvesting activities during critical soil moisture periods on 13,582 acres of easily eroded soils would result in moderate increases in erosion and decreases in soil productivity.

Impacts from Recreation Management. Managing 24,552 acres for ORV recreation opportunities would result in long-term erosion within these areas. Soils within a 19,957-acre portion of these ORV recreation areas are determined to be highly erodible. ORV-derived erosion would increase as more ORV enthusiasts become aware of and utilize these areas.

Impacts from Off-Road Vehicle Management. Not permitting ORV use on 20 percent of the planning area would protect these areas form ORV-derived erosion and other soil disturbance. Managing 46 percent of the planning area as open to ORV use would allow for decreased soil productivity as soils are disturbed and vegetation is trampled. Soil productivity losses would be greatest from ORV use on 25,336 acres of highly erodible soils. Seasonal ORV restrictions would partially protect soils on 163,227 acres from ORV-derived erosion during some of the soil moisture periods when soils are most vulnerable to damage.

Impacts from Major Utility Development. Managing 301,066 acres as open to development of major utility facilities would allow for increased soil disturbance due to construction and maintenance activities. Soil productivity losses would be greatest from these activities during critical soil moisture periods (March 1 through May 31) on 25,277 acres of highly erodible soils. Seasonal restrictions on these activities would partially protect 24,177 acres of highly erodible soils during portions of the critical soil moisture periods when soils are most vulnerable to damage.

Impacts from Fire Management. Management for both planned and natural prescribed burning on 169,930 acres would allow for vegetation type conversion from pinyon-juniper woodlands to a more soil-protective grass and forb plant community. Fire suppression activities (fire lines, ORV use) could decrease soil productivity by removing protective vegetation and increasing erosion and compaction. The overall net deterioration of soils would depend on site-specific variables.

CUMULATIVE IMPACTS ON SOILS

Under the proposed plan, soil conditions would be anticipated to improve slightly throughout the entire planning area. Intensive management of salinity areas and grazing allotments would benefit soil conditions within these areas. Intensive management would be especially beneficial on 39,000 acres of highly erodible soils. Permitting soil and watershed projects within 312,489 acres would allow for mitigation of soil erosion as problem areas develop.

Mineral activities, forest and woodland product harvests, livestock grazing on 38,953 acres, and ORV use would result in decreased soil productivity in portions of the planning area. This productivity loss would be most pronounced on 25,000 acres of highly erodible and saline soils where few watershed-protective measures would be implemented.

IMPACTS ON WATER RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Water Resources Management. Seasonal restrictions on surface-disturbing activities and potential livestock forage utilization limits on 30,960 acres of highly saline soils (Management Unit 5 and Management Unit 15) would reduce salinity and sediment levels in local surface waters and assist in reducing salinity levels within the Upper Colorado River Basin. Developing in-channel structures and land treatments on 24,177 of these acres would further protect surface waters from salinization and sedimentation.

Permitting watershed projects within an additional 312,489 acres would allow for mitigation of water quality deterioration as problem areas develop. Of these areas, 17,806 acres are within highly erodible and saline soil areas.

Impacts from Coal Management. Coal leasing and development would result in increased sediment yields from roads, mine facilities, or other surface-disturbing activities. Mine discharges and spoil-pile runoff could increase salt levels in local surface water systems. Overburden fracturing and subsidence from underground mining could result in loss of ground water quantity and quality. Loss of either surface or ground water could adversely affect adjudicated water rights. These impacts would be less pronounced within riparian corridors where mining would be restricted to protect riparian habitat.

Impacts from Oil, Gas, and Geothermal Resources Management. Identifying 685,696 acres as acceptable for oil and gas leasing could result in both surface and ground water impacts. Construction of roads and drilling pads would increase sediment and salinity yields in local surface waters. These impacts would be most pronounced on 34,505 acres of easily eroded and/or high salinity soils as oil and gas operations would be permitted during the critical wet soil period (March 1 through May 31) when these soils are most vulnerable to damage. Accidental fluid discharges during drilling operations could contaminate surface water.

Impacts from Locatable Minerals Management. Identifying 93 percent of the planning area as open to mineral entry and location could result in water quality degradation. Road construction and other mine-related disturbance would increase sediment and salinity loads in local surface waters. These impacts would be greatest from placer mining operations. All operations could result in heavy metal contamination from mine water discharges and spoil-pile runoff.

Impacts from Mineral Materials Management. Managing 92 percent of the planning area as open to disposal of mineral materials would impact water resources. Road construction and extraction of mineral materials would increase sediment and salt loads in local surface waters. These increased sediment and salt loads would be most pronounced from mineral material activities on 34,505 acres of easily eroded soils during critical wet soil periods (March 1 through May 31).

Mineral material operations in close proximity to perennial water courses would have the potential of destabilizing and altering natural stream channels and disrupting the beneficial values of floodplains. These impacts could result in alteration of water tables and surface water flows and could increase the destructiveness of floods.

Impacts from Riparian/Aquatic Systems Management. Managing riparian zones and aquatic habitat on 6,320 acres to improve vegetation condition, streambank cover, and aquatic diversity would result in reduced sediment yields and streambank erosion and improved chemical water quality. Closing seven miles of roads in the Potter Creek and Dry Fork of Escalante Creek drainages would reduce sediment loads in these areas.

Impacts from Wildlife Habitat Management. Soil disturbances from chainings and other vegetation treatments scattered over 300,527 acres would cause short-term sediment yield increases. Successful land treatments would reduce sediment yields and improve overall erosion conditions over the long-term.

Impacts from Livestock Grazing Management. Intensively managing 336,562 acres as "I" category grazing allotments would result in lower sediment yields as AMP objectives to increase ground cover are achieved. Short-term sediment yield increases would be expected from vegetation treatments. Sediment yields are not expected to change on 113,850 acres that are not within intensively managed allotments.

Permitting grazing during wet soil periods (March 1 through May 31) and forage utilization greater than 35

percent on 38,954 acres of easily eroded and highly saline soils could result in increased sediment and salinity yields. Eliminating grazing from March 20 to range readiness and increasing basal ground cover on 24,177 acres, and restricting forage utilization to 35 percent on 2,370 acres (Elephant Skin Wash area) of easily eroded and highly saline soils would reduce sediment and salt yields from these areas. Eliminating grazing from March 1 to May 15, potentially restricting forage utilization to 35 percent, and restricting livestock trailing on 6,320 acres of riparian/aquatic areas would result in reduced sediment yields and streambank erosion and improved water quality on 70 stream miles.

Impacts from Forest Management. Road construction and surface disturbance from harvest activities would result in increased sediment yields. Sediment yields would decrease over time if harvests result in an increase in basal ground cover. Harvesting activities during wet soil periods on 13,582 acres of easily eroded soils would result in moderate increases in surface water sedimentation.

Impacts from Recreation Management. Managing 24,552 acres for recreational ORV use would increase sediment and salt yields from these easily eroded and highly saline soil areas.

Impacts from Off-Road Vehicle Management. Not permitting ORV use on 20 percent of the planning area would protect these areas from ORV-derived sedimentation. Managing 46 percent of the planning area as open to ORV use would allow for increased sediment loads as soils are disturbed and vegetation is trampled. Water quality deterioration would be greatest from ORV use on 25,336 acres of highly erodible and saline soils. Seasonal ORV restrictions on 163,227 acres would partially protect these areas from ORV-derived sedimentation during wet soil periods when soils are most vulnerable to damage.

Impacts from Major Utility Development. Managing 301,066 acres as open to development of major utility facilities would allow for increased sediment loads due to construction and maintenance activities. Water quality deterioration would be greatest from these activities at stream crossings and during wet soil periods (March 1 through May 31) on 25,277 acres of highly erodible and saline soils. Seasonal restrictions on construction and major maintenance activities would partially protect 24,177 acres of highly erodible and saline soils from disturbance during wet soil periods when these soils are most vulnerable to damage.

Impacts from Fire Management. Management for both planned and natural prescribed burning on 169,930 acres would allow for vegetation type conversion from pinyon-juniper woodlands to a more watershed-protective grass and forb plant community. Fire suppression activities (fire lines, ORV use) could decrease watershed productivity by removing protective vegetation and increasing erosion and sedimentation. The overall net deterioration of watershed conditions would depend on site-specific variables.

CUMULATIVE IMPACTS ON WATER RESOURCES

Under the proposed plan, a slight improvement in water resources would be anticipated throughout the entire planning area. Intensive management of salinity areas, riparian zones, aquatic habitats, and grazing allotments would benefit the hydrologic condition of water courses and improve the chemical and physical properties of surface waters. Intensive management would be especially beneficial on 39,000 acres of highly erodible and saline soils.

Mineral activities, forest and woodland product harvests, livestock grazing on 38,954 acres, and ORV use would result in increased sediment and salt yields in portions of the planning area. These increased yields would be most pronounced on 25,000 acres of highly erodible and saline soils where few watershed-protective measures would be implemented.

IMPACTS ON RIPARIAN ZONES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Riparian Zone Management. Intensively managing 6,320 acres of riparian zones would improve vegetation cover, composition, density, and diversity. Overall improvement to fair or good vegetation condition could be expected over the short-term.

Impacts from Mineral Resources Management. Approximately 4,000 acres of riparian zones would be opened to mineral exploration if withdrawals are lifted. Road construction, facility development, dredging operations, and other surface-disturbing activities in riparian zones would remove riparian vegetation, compact the soil, and could redirect subsurface water.

Impacts from Soils and Water Resources Management. Water impoundment projects would improve conditions necessary for establishment of riparian vegetation. This could potentially increase riparian zones by 100 to 200 acres over the long-term.

Impacts from Wildlife Habitat Management. Development of in-channel structures designed to improve aquatic habitat would stabilize riparian vegetation and enhance its quality.

Impacts from Livestock Grazing Management. Potentially restricting livestock utilization to 35 percent on 6,320 acres of riparian zones and intensively managing grazing use on 5,125 acres of riparian zones would improve vegetation density, diversity, and stability over the next ten years.

Impacts from Forest Management. Road and facility construction and other surface-disturbing activities in riparian zones would remove riparian vegetation. An estimated 60 to 100 acres of riparian vegetation would be degraded over the next ten years.

Impacts from Recreation Management. Riparian vegetation on 35 acres in the Gunnison Forks area would be severely impacted by trampling and vehicle use.

Impacts from Off-Road Vehicle Management. Restricting vehicle use to designated roads and trails on 5,640 acres and closing an additional 680 acres of riparian zones in Potter and Roubideau creeks to ORV use would improve vegetation condition and eliminate rutting and soil compaction.

Impacts from Major Utility Developemnt. Eliminating riparian zones from major surface-disturbing activities having long-term adverse effects would protect these areas and maintain their present condition.

CUMULATIVE IMPACTS ON RIPARIAN ZONES

Direct and indirect intensive management under the proposed plan would result in improved vegetation conditions on 7,310 acres of riparian zones.

IMPACTS ON THREATENED AND ENDANGERED SPECIES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Threatened and Endangered Species Management. Designating 1,895 acres in Escalante Canyon as an Area of Critical Environmental Concern (ACEC) would protect the Uinta Basin hookless cactus (threatened), the Grand Junction milkvetch (candidate), the Delta lomatium (sensitive), and three unique plant associations from most surface-disturbing activities. Opportuntiies for research and special studies of the plant associations would be expanded. Designating 377 acres east of Montrose as a Research Natural Area, an area of critical environmental concern (RNA/ACEC) would protect populations and habitats of clay-loving wild buckwheat and Montrose penstemon from most surface-disturbing activities. Designating 6,783 acres north of Delta as an Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC) would protect occupied and potential habitat of the Uinta Basin hookless cactus and clay-loving wild buckwheat from disturbance over the long-term.

Pre-disturbance inventories area-wide would add substantially to the data base for all threatened and endangered species. Some inadvertent destruction of individual plants would occasionally occur.

Impacts from Mineral Resources Management. Closing 2,272 acres of threatened and endangered species habitat to mineral entry and location and placing a no surface occupancy stipulation on 9,135 acres would prevent accidental destruction of threatened and endangered plant species and potential habitat. Possible disturbance could affect 21,633 acres of potential endangered, threatened, candidate, and sensitive plant species habitat.

Removing the no surface occupancy stipulation on 140 acres of bald eagle wintering habitat would displace some bald eagles. Lifting mineral withdrawals on the lower Gunnison River and allowing surface-disturbing activities would reduce the value of 6,680 acres as wintering bald eagle habitat.

Impacts from Soils and Water Resources Management. In-channel structures and land treatment projects would be slightly beneficial to bald eagles and peregrine falcons. Water impoundments and resulting increases in vegetation cover would improve these raptors' prey base habitat.

Impacts from Riparian/Aquatic Systems Management. Improvement of the riparian zones along Roubideau and Escalante creeks and in the North Fork Valley would improve peregrine falcons' and wintering bald eagles' prey base habitat.

Impacts from Wildlife Habitat Management. Continued management of the Gunnison Forks HMP area would maintain existing bald eagle and river otter habitat. Peregrine falcons would be expected to increase their use of the area over the long-term. Waterfowl habitat improvement and associated land acquisition could provide migrating whooping cranes, long-billed curlews, and white-faced ibis with additional protected habitat and stop-over points.

Impacts from Livestock Grazing Management. Some localized disturbance and destruction of individual threatened and endangered plants would occur due to livestock trampling.

Impacts from Recreation Management. Decreasing river use in the Gunnison Gorge would improve river otter habitat through decreased destruction of riparian vegetation. Bald eagles and peregrine falcons would benefit from reduced human disturbance in the gorge.

Impacts from Off-Road Vehicle Management. Closing approximately 38,600 acres to ORV use and restricting vehicle use to designated roads and trails would eliminate potential destruction and damage of the Uinta Basin hookless cactus, spineless hedgehog cactus, Montrose penstemon, Grand Junction milkvetch, and clay-loving wild buckwheat.

Impacts from Wilderness Management. Management of 21,038 acres under wilderness guidelines would protect potential habitat of threatened and endangered plant and animal species from any mechanical disturbance. Habitat values would be maintained or improved.

PROPOSED PLAN IMPACTS

Impacts from Major Utility Development. Closing 6,783 acres of potential habitat of the Uinta Basin hookless cactus, clay-loving wild buckwheat, and Montrose penstemon to development of major utility facilities would protect these species from accidental destruction.

CUMULATIVE IMPACTS ON THREATENED AND ENDANGERED SPECIES

The research potential and study opportunities of several threatened and endangered species and unique plant associations would be protected with special designations. Designation of the Gunnison Gorge WSA as wilderness would protect bald eagle, peregrine falcon, and river otter habitats.

IMPACTS ON TERRESTRIAL WILDLIFE HABITAT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wildlife Habitat Management. Forage allocations for big game species on public land would meet both short-term and long-term demands.

Crucial deer and elk winter range management and land treatment projects would improve distribution, reduce stress, and decrease big game utilization of adjacent private lands. Minimizing disturbance in elk calving areas would reduce fetal mortality and increase calf survival.

Bighorn sheep habitat and herd management in the Gunnison Gorge area would potentially increase the population to 300 individuals by 1997. A small herd of bighorn sheep could be established in the Roubideau Canyon/Camel Back area. Rocky Mountain bighorn sheep habitat in the Baldy Peak area would be improved.

Waterfowl production on the lower Gunnison River would increase by up to 50 percent.

Impacts from Mineral Resources Management. Road and portal construction and other surface-disturbing activities associated with mineral development would reduce crucial deer and elk winter range in the North Fork area by 500 acres. Seasonal restrictions on oil and gas activity on crucial deer and elk winter range (140,181 acres of federal surface and 9,715 acres of split-estate lands) would lessen stress on deer and elk, thereby reducing mortality and fetal loss and improving overall condition and health of the herds.

Revocation of existing withdrawals that presently segregate federal minerals from entry and location under the general mining laws could increase surface disturbance on 61,270 acres of habitat. Raptor hunting habitat and some nesting areas would be lost. Habitat for other birds, including Lewis' woodpeckers, western bluebirds, and Scott's orioles, would possibly be reduced due to coal development.

Impacts from Soils and Water Resources Management. In-channel structures and water impoundments would provide habitat for waterfowl, chukars, mourning doves, mule deer, and non-game species.

Impacts from Riparian/Aquatic Systems Management. Restoring and protecting 6,320 acres of riparian zones would provide additional forage and cover for big game, waterfowl, and non-game birds and animals. The prey base for raptors and other predators would be improved.

Impacts from Livestock Grazing Management. Development of grazing systems, land treatment projects, and improved livestock management practices would improve forage conditions, reduce competition between livestock and big game, and improve distribution of most big game species. Eliminating livestock grazing use on approximately 24,177 acres during the spring would improve big game forage at a time when food reserves are low and females are pregnant. Improved nutrition may result in heavier birthweights and more successful reproduction. Land treatment projects designed to reduce sagebrush cover to less than 20 percent would eliminate present and potential sage grouse habitat in the Simms Mesa and Fruitland Mesa areas.

Impacts from Forest Management. Woodland harvests would provide temporary openings in forest stands, increasing edge effect and big game forage. The removal of old-growth timber would reduce thermal and hiding cover for big game and eliminate some nesting habitat for cavity-nesting birds. Woodland harvests could occur during the winter on 28,500 acres of crucial deer and elk winter range. On an annual basis, deer and elk would be displaced from 80 to 100 acres of active cutting area and adjacent habitat.

Impacts from Recreation Management. Restricting river use in the Gunnison Gorge would encourage continued expansion of the bighorn sheep population and prevent some degradation of riparian habitat for non-game species. Encouraging recreational and competitive ORV use in the North Delta area would curtail antelope utilization of the area, reducing antelope range by 8 percent. ORV use in the area would increase harassment of game and non-game wildlife and would displace prairie dog populations.

Impacts from Off-Road Vehicle Management. Closing 38,600 acres to vehicle use would eliminate disturbances or harassment of wildlife. This would be especially beneficial if desert bighorn sheep are reintroduced into the Camel Back area. Restricting vehicle use to designated roads and trails in crucial deer and elk winter range would reduce habitat loss. Seasonal ORV use restrictions in crucial deer and elk winter range would reduce stress on big game species,

thereby reducing fetal mortality and losses from poaching, and permitting wildlife utilization of the entire area.

Impacts from Major Utility Development. Confining development of major utility facilities in the North Fork area to existing corridors along major roads would limit disturbance and stress on all wildlife species. Prohibiting development of utility facilities on 82,038 acres would prevent short-term disturbances and long-term wildlife habitat modifications due to road construction and use. Bighorn sheep would benefit greatly from exclusion and restriction of utilities in the Gunnison Gorge and Camel Back areas.

Impacts from Disposal of Public Lands. Disposal of 3,337 acres of crucial deer and elk winter range and an additional 1,028 acres of non-crucial winter range would result in the loss of habitat for 35 elk and 20 deer and would increase big game pressure on adjacent private lands. Disposal of 120 acres of antelope range would result in an approximate one percent reduction in herd size. Disposal of tracts providing prairie dog habitat could affect potential occurrences of burrowing owls. Habitat for band-tailed pigeons, Cooper's hawks, goshawks, flammulated owls, and other non-game species would be affected.

Impacts from Acquisition of Non-Federal Lands. Acquiring non-federal lands in crucial deer and elk winter range would increase habitat and potential big game populations, and reduce wildlife conflicts and impacts on adjacent private lands. Acquiring non-federal lands for waterfowl habitat management would increase waterfowl populations on public lands.

Impacts from Acquisition of Access. Acquiring public access would improve big game harvests and population control practices.

Impacts from Fire Management. Natural and planned prescribed fires would reduce closed brush and tree canopies, stimulate plant growth and vigor, and temporarily improve forage palatability, resulting in improved habitat for many wildlife species. Large wildfires would reduce effective screening and thermal cover for deer and elk use.

CUMULATIVE IMPACTS ON TERRESTRIAL WILDLIFE HABITAT

Increased coal development and disposal of public lands in crucial deer and elk winter ranges in combination with the loss of habitat on private lands would be offset by improvement of habitat conditions throughout the planning area. Present big game populations would be maintained; small game and non-game populations and habitats would be improved.

IMPACTS ON AQUATIC WILDLIFE HABITAT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wildlife Habitat Management. Structures placed in Escalante, Cottonwood, Monitor, Potter, and Jay creeks would improve pool:riffle ratios, stabilize streambanks, increase instream cover, and reduce channelization, streambank erosion, and sedimentation. Approximately 30 stream miles of aquatic habitat would be improved. Managing approximately 52 stream miles associated with Terror, Escalante, Monitor, Criswell, Potter, and Dry creeks would stabilize streambanks, increase instream cover, and reduce sedimentation. Limiting surface-disturbing activities on aquatic habitat would increase streambank cover, improve bank stability and water quality, and reduce soil compaction, sedimentation, and siltation. Land treatment projects in or near stream channels would increase sedimentation over the short-term and decrease it over the long-term.

Impacts from Mineral Resources Management. Road and pipeline development and other surface-disturbing activities would lead to increased sedimentation and streambank instability on 25 stream miles of aquatic habitat. Site-specific approval of surface-disturbing activities in aquatic areas could result in slight to moderate increases in sedimentation, water temperatures, and streambank erosion.

Impacts from Soils and Water Resources Management. In-channel structures designed to reduce sedimentation and salinity would improve aquatic habitat on streams below these structures.

Impacts from Riparian/Aquatic Systems Management. Improved riparian management on 6,320 acres of public land would result in improvement of 40 stream miles of aquatic habitat. Streambank stability, sedimentation, and water temperatures would benefit from improved streambank cover.

Impacts from Livestock Grazing Management. Intensive grazing management on 60 stream miles of aquatic habitat combined with a potential 35 percent utilization of key forage species limitation would improve streambank stability and cover. Sedimentation would decrease and water temperatures would stabilize. The existing condition would be maintained on the balance of the aquatic habitat. Land treatment projects in or near stream channels would increase sedimentation over the short-term and decrease it over the long-term.

Impacts from Forest Management. Road construction across aquatic areas could cause increased sedimentation, bank degradation, and water temperatures, and decreased streambank cover.

PROPOSED PLAN IMPACTS

Impacts from Recreation Management. Restricting river use in the Gunnison Gorge to six group encounters per day would improve streambank vegetation and water quality and reduce sedimentation. Aquatic habitat in the Gunnison Forks area would continue to be degraded due to trampling and intensive recreational use.

Impacts from Off-Road Vehicle Management. Closing areas to ORV use, imposing seasonal restrictions on ORV use, and restricting vehicle use to designated roads and trails in riparian zones should improve streambank stability and reduce sedimentation. The areas remaining open to ORV use would be subject to degradation.

Impacts from Major Utility Development. Short-term impacts caused by road construction, clearings for powerline pads, and pipelines would result in slight to moderate adverse impacts on aquatic and riparian habitat. Loss of vegetation, streambank deterioration, sedimentation, and erosion would cause localized impacts on aquatic/riparian organisms and habitat. Prohibiting or seasonally restricting surface-disturbing activities that would have long-term adverse effects on riparian/aquatic systems would, at the minimum, maintain current habitat quality.

CUMULATIVE IMPACTS ON AQUATIC WILDLIFE HABITAT

Approximately 140 stream miles of aquatic wildlife habitat would improve under management emphasizing habitat quality and protection. Eliminating or reducing surface-disturbing activities and potentially limiting livestock grazing utilization to 35 percent in riparian zones would have the greatest overall beneficial effect.

IMPACTS ON LIVESTOCK GRAZING

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Livestock Grazing Management. Not allocating additional forage for livestock use on 74,133 acres would reduce present grazing preferences by the 3,380 animal unit months (AUMs) currently in suspension. Land treatment projects and grazing management would increase forage allocations for livestock by 1,424 AUMs.

Impacts from Soils and Water Resources Management. Limiting livestock utilization to 35 percent of key forage species on 30,960 acres would reduce livestock allocations by 594 AUMs on ten grazing allotments. Eliminating livestock grazing on 24,177 acres from March 20 to range readiness could shift some livestock use to the fall, resulting in increased conflicts between livestock grazing and hunting use, higher mortality from disease due to longer spring confinement, increased trailing use, and decreased hay production due to livestock use of base property hay lands for a longer period in the spring. Additional forage would become available over the long-term due to reduced spring use. In-channel structures and land treatment projects designed to reduce erosion and salinity would improve livestock distribution and increase available forage.

Impacts from Riparian/Aquatic Systems Management. If forage utilization by livestock is limited to 35 percent of key forage species on 6,320 acres of riparian vegetation, livestock allocations could be reduced by approximately 200 AUMs on seven grazing allotments. Eliminating livestock grazing on 6,320 acres from March 1 through range readiness could shift some livestock use to the fall, resulting in increased conflicts between livestock grazing and hunting use, higher mortality from disease due to longer spring confinement, increased trailing use, and decreased hay production due to livestock use of base property hay lands for a longer period in the spring. Reduced trailing use through riparian zones could increase trailing time and operating costs and require more corrals.

Impacts from Wildlife Habitat Management. Developing new land treatment projects and maintaining existing projects would improve livestock distribution and enhance maintenance of existing livestock forage allocations in treatment areas.

Impacts from Forest Management. Forest and woodland harvests would increase forage available for livestock grazing use in most harvested areas. Improved access and thinning would improve livestock distribution. Precluding any development or maintenance of land treatment projects on 47,384 acres would result in a 10 percent loss of forage (1,087 AUMs) over the long-term.

Impacts from Recreation Management. Restricting fencing in portions of the Gunnison Gorge SRMA could preclude the possibility of changing the livestock class from sheep to cattle, and could eliminate opportunities to use fencing to improve livestock distribution.

Impacts from Off-Road Vehicle Management. Limiting vehicle use on grazing areas through closures or restrictions would improve livestock forage, decrease harassment of livestock, and reduce management problems created by ORV use.

Impacts from Disposal of Public Lands. Disposing of 7,522 acres of public land that is currently grazed by livestock would reduce livestock allocations by a total of 786 AUMs on seven "M" category, ten "I" category, and 26 "C" category grazing allotments.

Impacts from Acquisition of Access. Acquisition of public access would improve administration of the livestock grazing program but could result in increased harassment of livestock and vandalism of livestock facilities.

Impacts from Fire Management. Available forage and species diversity would improve on 169,930 acres of public land where fires meeting pre-determined prescriptions would

be permitted. Fires could cause some damage to livestock facilities (fences, catchments, and corrals).

CUMULATIVE IMPACTS ON LIVESTOCK GRAZING

A net loss of 5,682 AUMs would occur over the long-term, due primarily to disposal of public lands and a 35 percent utilization limit on the riparian and salinity areas. Increased livestock operator costs and increased conflicts with recreational users would occur. The demand for livestock forage would probably not be met over the long-term.

IMPACTS ON FORESTRY

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Forest Management. Intensive management of 24,255 acres of suitable pinyon-juniper woodlands would result in potential annual harvests of 1,213 cords of fuelwood. Suitable commercial forest lands on 3,127 acres would produce 160.5 thousand board feet (MBF) of timber annually. Harvest of 123 acres of suitable commercial forest on 160 acres of land owned by the Girl Scouts of America would be precluded.

Impacts from Mineral Resources Management. Road, pad, and portal construction and other surface-disturbing activities associated with mineral development would reduce suitable woodlands and commercial forest lands to a limited degree. Road construction could improve access into several potential sale areas, thereby reducing costs associated with forest harvest.

Impacts from Riparian/Aquatic Systems Management. Eliminating 482 acres of suitable woodlands within riparian/aquatic zones from harvest would reduce annual fuelwood production by 24 cords. Eliminating 32 acres of commercial forest lands within riparian/aquatic zones from harvest would reduce timber production by 2.5 MBF.

Impacts from Threatened and Endangered Species Management. Eliminating 116 acres of suitable woodlands within the Escalante Canyon ACEC from harvest would reduce fuelwood production by six cords annually.

Impacts from Wildlife Habitat Management. Maintaining existing land treatment projects on 600 acres of pinyon-juniper woodlands would reduce annual fuelwood harvests by 30 cords. Restricting timber harvests on 2,565 acres in the Storm King/High Park area would increase the stand rotation from 120 to 200 years.

Impacts from Livestock Grazing Management. Managing 17,314 acres of suitable pinyon-juniper woodlands for increased forage production could reduce fuelwood harvests by 866 cords annually.

Impacts from Recreation Management. Eliminating 1,311 acres of woodlands within the Gunnison Gorge SRMA from harvest would reduce annual fuelwood harvests by 66 cords.

Impacts from Wilderness Management. Annual harvests of 17 cords of fuelwood would be precluded on 337 acres of woodlands which would be included in the designated wilderness area. The effect on the total forestry program would be miminal.

Impacts from Disposal of Public Lands. Disposal of 1,471 acres of suitable woodlands would preclude potential fuelwood harvests and reduce annual fuelwood production by 74 cords. Disposal of 403 acres of suitable commercial forest lands would reduce annual timber harvests by 30 MBF.

Impacts from Acquisition of Access. Acquiring access into the 11 identified areas would allow harvesting on 1,606 acres of commercial forest lands and on 2,040 acres of pinyon-juniper woodlands.

Impacts from Fire Management. Maximum fire protection in the Storm King, High Park, and North Fork areas would protect 36,800 MBF of commercial timber. Minimum fire protection in the pinyon-juniper woodlands would result in only minor losses estimated at approximately nine cords per acre burned.

CUMULATIVE IMPACTS ON FORESTRY

Multiple-use needs would eliminate sustained yield production on 21,631 acres of suitable woodlands, resulting in an annual loss of 1,083 cords of fuelwood. Harvest on 558 acres of suitable commerical forest lands would be precluded, resulting in an annual loss of 41.5 MBF of timber. Intensive management of the forest resource would result in an annual harvest of 160.5 MBF of timber from 3,127 acres of suitable commercial forest lands and 1,213 cords of fuelwood from 24,255 acres of suitable woodlands.

IMPACTS ON RECREATION

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Recreation Management. Under the proposed plan, recreationists would benefit significantly from management of the variety of recreation opportunities available within the planning area. Managing 47,655 acres (Management Unit 4, Management Unit 14, and Management Unit 15) for recreation would protect scenic values and increase recreation opportunities in these areas.

Designating 1,895 acres within Escalante Canyon as an ACEC would protect the scenic qualities of this valued recreational resource and allow for increased management of the "Potholes" swimming area. Managing 8,942 acres

north of Delta as an ORV use area and 15,610 acres within the Gunnison Gorge SRMA as open to ORV use would accomodate long-term recreational ORV demands. Developing river access at the Escalante Bridge would facilitate boating use on the lower Gunnison River.

Limiting boating use in the Gunnison Gorge to a maximum of ten group encounters per day would be highly beneficial to recreationists seeking scarce wilderness boating experiences. No Colorado rivers are managed for wilderness experiences. Recreation demand on the six designated wilderness rivers (273 river miles) in the continental United States exceeds the number of use permits available annually. As competition for river-use permits in the Gunnison Gorge exceeds allocations, private and commercial users would experience inconvenience in trip planning and increased possibilities of not obtaining a permit.

Impacts from Mineral Resources Management. Withdrawing 23,390 acres from mineral entry and location, and closing or restricting oil and gas activity surface uses on 30,173 acres would protect the natural and scenic features of these areas from disturbances resulting from mineral activities. Revoking all portions of the BLM protective withdrawal (8,446 acres) and the BOR Fruitland Mesa withdrawal (1,235 acres) located within the Gunnison Gorge SRMA would allow for mineral activities in these areas. These activities would degrade recreation opportunities in predominantly natural areas that are accessed by primitive roads.

Impacts from Salinity Control Management. Limiting vehicle use within the Elephant Skin Wash area to designated roads and trails would reduce the lands available for recreational ORV use by 2,370 acres. This area is presently utilized and preferred for ORV recreation.

Impacts from Riparian/Aquatic Systems Management. Protecting and enhancing 6,320 acres of riparian/aquatic systems would benefit recreationists seeking scenic and educational opportunities within this diverse wildlife community.

Impacts from Wildlife Habitat Management. Management of the Gunnison Forks and Billy Creek habitat management areas, deer and elk winter ranges, elk calving areas, and waterfowl habitats would enhance opportunities for hunting, fishing, and wildlife observation.

Impacts from Livestock Grazing Management. Recreational ORV opportunities would be protected by not permitting placement of livestock facilities that would create safety hazards or impede vehicle use on 8,942 acres.

Impacts from Forest Management. Prohibiting woodland harvests in the Escalante Canyon ACEC and on all but 1,255 acres of the Gunnison Gorge SRMA would protect scenic and predominantly natural recreation settings.

Impacts from Off-Road Vehicle Management. Closing the Gunnison Gorge WSA, the Camel Back area, and the Adobe Badlands ONA/ACEC to ORV use would ensure continued availability of high quality and non-motorized recreation settings in the planning area. Restricting vehicle use to designated roads and trails on 25,182 acres of the Gunnison Gorge SRMA, the Escalante Canyon ACEC, the Needle Rock ONA/ACEC, and in riparian areas would protect the scenic values of these recreation lands. Managing 24,552 acres for recreational ORV use would accomodate long-term ORV use demands and would decrease pressure on areas under ORV use restrictions.

Impacts from Cultural Resources Management. A Class III cultural resource inventory would benefit recreationists by identifying cultural sites with public educational values.

Impacts from Visual Resources Management. Protecting scenic qualities of the Gunnison Gorge WSA, the Adobe Badlands ONA/ACEC, and the Needle Rock ONA/ACEC (VRM Class I) and 15,208 acres of the Gunnison Gorge SRMA (VRM Class II) would ensure continued availability of high quality scenic resources in these areas.

Impacts from Wilderness Management. Designating 21,038 acres within the Gunnison Gorge as wilderness would protect wilderness recreation opportunities in this area.

Impacts from Major Utility Development. Management of 61,327 acres of recreation and wilderness areas as closed to development of major utility facilities would protect high quality recreation settings. Managing 2,478 acres of the Gunnison Gorge SRMA in the Smiths Mountain and Gunnison Forks areas as open to development of major utility facilities would allow for potential deterioration of natural settings within these areas.

Impacts from Acquisition of Non-Federal Lands. Acquiring 2,200 acres within or contiguous to the Gunnison Gorge SRMA would protect recreation settings, provide more public access, and reduce conflicts between recreationists and private landowners.

Impacts from Acquisition of Access. Acquiring public access along the Gunnison Gorge rim southwest of the Gunnison Forks area and from Colorado Highway 92 to the Gunnison River in the Austin area would provide access to high value recreation lands and facilitate recreation opportunities.

CUMULATIVE IMPACTS ON RECREATION

Recreation opportunities would be significantly enhanced and increased under the proposed plan. A total of 74,267 acres would be managed for a wide variety of recreation opportunities including but not limited to river boating, ORV use, wilderness experiences, back country travel, hunting, fishing, and scenic viewing. Revoking the BLM protective

withdrawal within the Gunnison Gorge SRMA (8,446 acres) and permitting major utility development in the Smiths' Mountain and Gunnison Forks areas would result in deterioration of recreation values if these lands are developed.

IMPACTS ON CULTURAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Cultural Resources Management. Cultural clearances of areas proposed for disturbance would contribute to the cultural data base, decrease cultural site disturbances, and increase the potential for discovery of sites eligible for inclusion to the National Register of Historic Places. Class III inventories on 5,848 acres would significantly add to the cultural data base. High-value cultural sites on these acres could be protected by special designations.

Impacts from Mineral Resources Management. The no surface occupancy stipulation for oil and gas activities and the closure to disposal of mineral materials on 9,135 acres would protect the integrity of the cultural resources in the area from potentially disturbing activities. Cultural resources on an additional 2,352 acres would be protected by a locatable mineral withdrawal.

Impacts from Off-Road Vehicle Management. Exposed cultural resources would remain vulnerable to vehicle-related damage on the 80 percent of the planning area that would be open to ORV use for all or portions of the year. Cultural resources would also remain vulnerable to vandalism and illegal artifact collection by individuals using vehicles for easy access and transport of artifacts. Closing the 10,402 acres within the Camel Back WSA to ORV use would eliminate vehicle-related damage and reduce illegal collection and site vandalism in this area.

Impacts from Wilderness Management. Designation of the Gunnison Gorge WSA (21,038 acres) as wilderness would generally benefit cultural resources. The integrity of these resources would be protected as no potential would exist for removal of cultural resources as mitigation for surface-disturbing activities.

Gaining knowledge of cultural resources would be impeded as site excavations would not be permitted in most instances. Field surveys, normally required during environmental analyses of proposed surface-disturbing activities, would also be eliminated as a data source. Since stabilization would not normally be permitted, exposed cultural sites would continue to deteriorate over the long-term due to weathering and other natural forces.

Impacts from Acquisition of Access. Acquiring public access to any of the 16 areas identified for access acquisition would increase the potential for illegal disturbance of cultural sites in these areas.

CUMULATIVE IMPACTS ON CULTURAL RESOURCES

Cultural resources would be protected from land uses that require use authorizations but would remain susceptible to vandalism and theft. Vandals and relic-hunters would have easy access to the 80 percent of the planning area that would be managed as open to ORV use for all or portions of the year. With the exception of Class III inventories on 5,848 acres, cultural research would continue to be random inventories and salvage efforts in response to project proposals. High-value cultural sites on inventoried acres could be protected by special designations.

IMPACTS ON VISUAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Visual Resources Management. Table 12 lists the acres of land in each VRM classification.

Table 12

ACRES IN EACH VRM CLASSIFICATION: PROPOSED PLAN

VRM CLASS	ACRES	PERCENTAGE OF PLANNING AREA
I	27,901	6
II	27,384	6
III	293,417	60
IV	134,375	28
TOTALS	483,077	100

Impacts from Mineral Resources Management. Mineral development in the planning area would be anticipated to alter the landscape characteristics of a few localized viewsheds.

Impacts from Wildlife Habitat and Livestock Grazing Management. Major vegetation treatments would alter landscape characteristics. Changing VRM classifications in the Billy Creek area from Class II to Class III would increase the allowable visual contrast of projects from low to moderate.

Impacts from Forest Management. Timber and woodland product harvests would alter landscape characteristics in localized areas.

PROPOSED PLAN IMPACTS

Impacts from Recreation Management. Recreation management would maintain landscape characteristics and preserve scenic qualities in the Escalante Canyon ACEC, the Adobe Badlands ONA/ACEC, the Needle Rock ONA/ACEC, and portions of the Gunnison Gorge SRMA. Visual resource protection needs would increase in all recreation areas as viewer volume and sensitivity would increase and viewing distance would decrease.

Impacts from Off-Road Vehicle Management. Managing 80 percent of the planning area as open to ORV use for all or portions of the year would degrade landscape characteristics in these areas. This impact would be most pronounced on 24,552 acres managed for ORV recreation. Changing VRM classifications from Class II to Class IV in large portions of the ORV recreation lands would increase the allowable visual contrast of surface disturbing activities on these lands from low to high.

Impacts from Wilderness Management. Designating the Gunnison Gorge WSA as wilderness would preserve the natural scenic values of the area.

Impacts from Disposal of Public Lands. Disposal of a 40-acre tract adjacent to Colorado Highway 62 and within one mile of the community of Ridgway could result in the loss of a scenic overlook site in a VRM class II area.

CUMULATIVE IMPACTS ON VISUAL RESOURCES

Designating 12 percent of the planning area (55,285 acres) as VRM Class I or Class II would protect highly scenic visual resources. These lands include all the areas that are most used by recreationists seeking natural settings. Designating the remainder of the area as VRM Class III or Class IV would maintain the overall visual characteristics of the planning area but would allow for visually-contrasting projects or disturbances in localized viewsheds.

IMPACTS ON WILDERNESS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wilderness Management. Designating the Gunnison Gorge WSA as wilderness would permanently protect the high quality wilderness values of this area, which include a pristine environment and outstanding opportunities for primitive and unconfined recreation. The high quality nature of these values is evidenced by the BLM recreation lands designation in 1972, the determination that the area is suitable for wild and scenic river designation, and the Colorado DOW's Gold Medal Trout Fishery designation. The WSA is contiguous to the nationally acclaimed Black Canyon of the Gunnison Wilderness Area, which is administered by the National Park Service (NPS). Designating the Gunnison Gorge as wilderness would expand that wilderness area. It would also permanently protect the Black Canyon/Gunnison Gorge system as one geologic, ecologic, and physiographic unit.

Not designating the Camel Back WSA and Adobe Badlands WSA as wilderness would prevent the permanent protection of these areas' existing wilderness values, which include pristine environments and outstanding opportunities for primitive and unconfined recreation. The ORV closure on the Camel Back area (10,402 acres) and the ORV closure and restrictions on surface-disturbing activities on 6,783 acres of the Adobe Badlands ONA/ACEC would partially protect wilderness values on these lands as long as this type of management remains in effect. Surface-disturbing activities would be anticipated to impair wilderness values within both WSAs over time.

IMPACTS ON MAJOR UTILITY DEVELOPMENT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Major Utility Management. Determining which public lands within the planning area are available for development of major utilities provides utility companies with information necessary to plan and design projects. Table 13 lists the acres of public land identified as needed and not needed for major utility development under each management classification.

The following impacts pertain only to those public lands that are identified in the 1980 and 1985 Western Regional Utility Corridor Study(s) as being needed for future development of major utility facilities. Closures or restrictions on lands not identified as being needed for utility facilities would be assumed to have a negligible impact on local and regional major utility development.

Impacts from Coal Management. Managing 3,511 acres of the Paonia/Somerset coal planning area as closed to major utility development would restrict future development of these facilities to a one-half mile wide corridor adjacent to Colorado Highway 133. This management would result in a low adverse impact to future major utility development as this corridor is anticipated to accommodate future major utility needs in this area. Route options available to utility developers would be reduced.

Future major utility development would be precluded on public lands in the Terror Creek drainage. Utility development linking the Montrose and Rifle areas would be restricted as Terror Creek is one of two important utility corridors connecting these areas. These lands are presently utilized for a 235 kv electrical transmission line. Utility companies could not utilize this route nor realize the cost/benefits of grouping new and existing facilities; they would be required to utilize lands adjacent to Colorado Highway 133 or private lands adjacent to the Terror Creek drainage.

Table 13

MANAGEMENT OF PUBLIC LANDS FOR MAJOR UTILITY DEVELOPMENT: PROPOSED PLAN

MANAGEMENT CLASSIFICATION FOR DEVELOPMENT OF MAJOR UTILITIES	ACRES OF PUBLIC LAND		
	Identified as needed for major utility development	Identified as not needed for major utility development	TOTALS
Open	98,612	202,394	301,006
Sensitive	934	5,762	6,696
Seasonally closed	22,739	70,598	93,337
Closed	3,511	78,527	82,038
TOTALS	125,796	357,281	483,077

Source: 1980 and 1985 Western Regional Utility Corridor Study(s).

Both of these options would probably be less desirable and cost-effective than utilizing existing routes.

Impacts from Soils and Water Resources Management. Construction and major maintenance of new utility facilities would not be permitted on 11,062 acres from March 1 through May 31 if necessary to protect wet soils. Utility companies would experience operating inconvenience on these areas from April 15 through May 31, based on a typical construction/maintenance season of April 15 to October 15.

Impacts from Riparian/Aquatic Systems Management. Major utility development would not be effected on 557 acres as vegetation rehabilitation would mitigate surface disturbances over the long-term.

Impacts from Threatened and Endangered Species Management. Management of two tracts of land totalling 377 acres (Management Unit 13) as closed to buried major utility facilities and limited to no surface disturbance from above-ground facilities to protected threatened and endangered plants and their habitat would have a low impact on utility development. These tracts could easily be avoided during planning and placement of utility facilities.

Impacts from Wildlife Habitat Management. No construction and major maintenance of new utility facilities would be permitted on 11,677 acres of crucial deer and elk winter range from December 1 through April 30. Utility companies would experience operating inconvience in these areas from April 15 to May 1, based on a typical construction/maintenance season of April 15 to October 15.

CUMULATIVE IMPACTS ON MAJOR UTILITY DEVELOPMENT

Management under the proposed plan would result in a low adverse impact to major utility development. Seasonal restrictions on construction and major maintenance on 18 percent of the public lands identified as needed for future utility development would result in operating inconvenience and potential cost increases for utility companies. Restrictions would be most significant in the salinity control areas (11,062 acres) where one-quarter of the typical construction season would be under this seasonal operating restriction.

Excluding major utility development within the Terror Creek drainage would restrict utility development linking the Montrose and Rifle areas to alternate and possibly less desirable and cost-effective routes.

IMPACTS ON ACCESS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Acquisition of Access. Acquiring access into 16 areas would improve administration and allow for public utilization of these public lands.

IMPACTS ON ECONOMIC RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Coal Management. Present and future demands for coal in Delta and Gunnison counties, with market values ranging from $31 million to $103 million annually (1984 values), would be met over the life of this

plan. Meeting coal demands would have a corresponding positive impact on generation of local incomes and royalties paid to federal and state governments. Coal production costs would be anticipated to increase slightly within the riparian, aquatic, and crucial winter range areas where requirements for additional mitigation or seasonal restrictions would be applied.

Impacts from Locatable Minerals Management. Economic benefits associated with the unknown mineral potential on 32,750 acres of withdrawn lands would not be achieved.

Impacts from Soils and Water Resources Management. Completing and maintaining the Elephant Skin Wash salinity control project would contribute to lower water treatment costs downstream. During the life of the plan, the projected reduction in salinity of 1,434 to 2,209 tons would serve to lower salinity costs in the Colorado River Basin by $83,172 to $128,122. Any additional projects would have similar economic benefits. The local economy would benefit from slightly increased soil productivity and reduced costs for less frequent removal of reservoir sedimentation.

Impacts from Livestock Grazing Management. Current trends and conditions associated with management of 32,607 AUMs, valued at $247,813 (1985 values), would continue. These AUMs represent a decrease of 5,677 AUMs, valued at $43,145, from the existing situation. Any loss of AUMs could result in financial losses for the affected ranching operations.

Impacts from Forest Management. The sale of forest and woodland products would produce about $19,267 in federal revenues annually. These revenues would be nearly the same as the average annual revenues since 1981. Local employment and income would be supported to the extent that timber and woodland harvesting would be by local commercial cutters and sold locally. The sale of 1,213 cords of fuelwood annually would offset local residential heating costs.

Impacts from Disposal of Public Lands. The disposal of the 143 tracts of public land (totalling 11,026 acres) within the planning area which are identified as suitable for disposal could result in revenues ranging from $3 million to $6 million, based on estimated average sales prices of $300 to $600 per acre. Disposal would occur over a period of several years, with receipts going primarily to the Federal treasury. These receipts would represent less than one-tenth of one percent of estimated Federal revenues and are not, therefore, significant.

CUMULATIVE IMPACTS ON ECONOMIC RESOURCES

The cumulative impact on the local economy is likely to be beneficial but not large. The loss of AUMs could result in financial losses for ranching operations. Development of coal, water, forest, and recreation resources could offset any negative economic impacts from losses of AUMs.

PREPARATION AND DISTRIBUTION

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Bureau of Land Management staff and resource specialists who provided resource data, coordinated input and revisions, and responded to public comments during the development and preparation of the Proposed Resource Management Plan and Final Environmental Impact Statement are listed as follows:

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DISTRIBUTION OF THE PROPOSED RMP AND FINAL EIS

This Proposed Resource Management Plan and Final Environmental Impact Statement will be distributed to approximately 900 addresses, including all addresses to which the Draft RMP/EIS was sent (see the ***Review of the Draft RMP/EIS*** section of this document). The original distribution list for the Draft RMP/EIS has been expanded to include those individuals, organizations, and agencies who testified at the public hearings, submitted written comments, or requested copies of the draft.

APPENDIX A

STIPULATIONS FOR OIL AND GAS LEASES

The following stipulations would be added to future oil and gas leases on both federal surface and split-estate lands where assigned for each management unit (see beginning page 146). The actual wording of these stipulations may be adjusted at the time of leasing to reflect future legislation, court decisions or policy changes; however, the protection standards contained in these stipulations would be maintained. Any change to the protection content of the stipulation would require an amendment to the RMP/EIS.

Highly Erodible and/or Saline Soil Areas

Stipulation: To protect watersheds from salinity infusions and to protect highly erodible soil areas where low soil productivity would prolong or disallow revegetation, all development activities (exploration, drilling, etc.) will be allowed only from June 1 through February 28. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on salinity and highly erodible soil areas. The stipulation would not be waived, excepted, or modified if it is determined that the activity would cause accelerated erosion that would result in excessive amounts of salinity being contributed to the Colorado River. Variances could be allowed if soils are not saturated during the typical high soil moisture period when these soils are most susceptible to damage (March 1 through May 31), or if impacts could be mitigated, or if site-specific conditions do not warrant the stipulation (small amount of disturbance, short duration of operations, etc.).

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Threatened, Endangered, Candidate, and Sensitive Plant Areas

Stipulation: To protect the threatened, endangered, candidate, and sensitive plants and their potential habitat within the Escalante Canyon Area of Critical Environmental Concern and the Fairview Research Natural Area, an area of critical environmental concern, no surface occupancy would be permitted in these areas. Exceptions to this restriction may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on threatened, endangered, candidate, and sensitive plants and their potential habitats within these areas.

Bald Eagle Winter Concentration Areas

Stipulation: To protect bald eagles from activities that would cause abandonment of winter concentration areas, all development activities (exploration, drilling, etc.) will only be allowed in these areas from May 1 through November 30. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on wintering bald eagles.

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by

the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Crucial Deer and Elk Winter Ranges

Stipulation: To protect crucial deer and elk winter ranges from activities that would cause these species to abandon areas of crucial winter forage and cover for less suitable ranges, all development activities (exploration, drilling, etc.) will only be allowed from May 1 through November 30. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on deer and elk utilization of crucial winter ranges. Variances could be allowed if these crucial ranges are not being utilized due to mild winter conditions or temporary changes in winter range utilization, or if impacts could be mitigated, or if site-specific conditions do not warrant the stipulation (small amount of disturbance, short duration of operations, etc.).

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Elk Calving Areas

Stipulation: To protect elk calving areas from activities that would force elk to abandon these areas during critical calving periods, all development activities (exploration, drilling, etc.) will only be allowed from July 16 through April 14. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on calving elk.

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Waterfowl Habitat

Stipulation: To protect waterfowl from activities that would alter breeding behavior, increase the incidence of nest abandonment, and decrease breeding success, all development activities (exploration, drilling etc.) will only be allowed in waterfowl habitats from July 1 through March 14. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on

breeding and nesting waterfowl. Variances could be allowed if these breeding habitats are not being utilized, or if impacts could be mitigated, or if site-specific conditions do not warrant the stipulation (few individuals affected, short duration of operations, etc.).

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Outstanding Natural Areas

Stipulation: To protect the scenic, natural, and scientific values of the Adobe Badlands Outstanding Natural Area, an area of critical environmental concern, and the Needle Rock Outstanding Natural Area, an area of critical concern, no surface occupancy would be permitted within these areas. Exceptions to this restriction may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on the scenic, natural, and scientific values of these areas.

Wilderness Study Areas

Stipulation: Wilderness Protection Stipulation Form CSO 3000-1 (July 1980) is attached per Washington Office Instruction Memo No. 80-509 (5/12/80). This memo implements the Interim Management Policy and Guidelines for Land Under Wilderness Review (12/12/79 and amendments).

Reasons for Exceptions: This stipulation would be attached to all leases involving lands within WSAs, and would apply until these lands are released from WSA status.

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ACRONYMS

ACEC: Area of Critical Environmental Concern
AMP: Allotment Management Plan
APD: Application for Permit to Drill
AUM: Animal Unit Month
BLM: Bureau of Land Management
BOR: Bureau of Reclamation
CFR: Code of Federal Regulations
DOW: Colorado Division of Wildlife
EA: Environmental Assessment
EIS: Environmental Impact Statement
EO: Executive Order
EPA: Environmental Protection Agency
FERC: Federal Energy Regulatory Commission
FLPMA: Federal Land Policy and Management Act
FMP: Forest Management Plan
HMP: Habitat Management Plan
KGS: Known Geologic Structure
kv: kilovolt
MBF: Thousand Board Feet
MSA: Management Situation Analysis
NPS: National Park Service
ONA: Outstanding Natural Area
ORV: Off-Road Vehicle
PLO: Public Land Order
PSD: Prevention of Significant Deterioration
RAMP: Recreation Area Management Plan
R&PP: Recreation and Public Purposes Act
RMP: Resource Management Plan
RNA: Research Natural Area
ROD: Record of Decision
RPS: Rangeland Program Summary
RS: Revised Statutes
SRMA: Special Recreation Management Area
T&E: Threatened and Endangered
TPCC: Timber Production Capabilities Classification
UBRA: Uncompahgre Basin Resource Area
USDI: U.S.Department of the Interior
USFS: U.S. Forest Service
USFWS: U.S. Fish and Wildlife Service
USGS: U.S. Geological Survey
VRM: Visual Resource Management
WSA: Wilderness Study Area
WTS: Wilderness Technical Supplement

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